

APPENDIX A

SCOPING COMMENT SUMMARIES

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Air Quality Comment Summary

Letter #	Author	Comment
KSL-0003	State of Wyoming, Department of Environmental Quality (DEQ)	Address impacts from fire (smoke, public health, etc.).
		Review air quality regulations relative to their management regulations.
		The Resource Management Plan (RMP) should address the air quality and visibility impacts to the Class I Areas based on the RMP alternatives.
KSL-0006	Defenders of Wildlife, The Wilderness Society, Wyoming Outdoor Council, Wyoming Wilderness Association, Upper Green River Valley Coalition, American Lands Alliance	Bureau of Land Management (BLM) should determine what the desired outcome(s) from oil and gas leasing, exploration, and development activities are, particularly with reference to the desired outcome(s) for endangered species protection, migratory wildlife, non-migratory wildlife, prevention of habitat fragmentation, protecting the naturalness of landscapes and their aesthetic appeal, the prevention of unnecessary or undue degradation of public lands, the prevention of air and water pollution, and the protection of surface owner rights on slit-estate lands.
		Meeting the requirements of applicable State implementation plans and ambient air quality standards is a must, and air quality in non-attainment areas must be improved.
		The BLM should take a proactive approach to managing air quality by: gathering baseline air quality data; setting aggressive standards; requiring any actions on public lands to meet those standards (i.e. no flaring, no two-stroke engine use on public lands, etc); analyzing the cumulative impact of any proposed action with other past, present, and reasonably foreseeable actions; establishing an effective monitoring program; and halting any actions that contribute to air pollution if such monitoring reveals that standards have been exceeded.
		The environmental impact statement (EIS) should address the issue of regional haze and the destruction of viewsheds caused by haze.
		The EIS should address how prevention of significant deterioration requirements can be met, and the RMP should require steps to ensure they are met.
		Oil and gas development activities directly contribute to air pollution in several ways, and all should be addressed in the RMP EIS.
		In view of the potential oil and gas boom in the Upper Green River Valley, the RMP EIS must contain a comprehensive analysis of the impact oil and gas exploration and development will have on Wyoming's clean air, clear vistas, and community health.
		Impairment of visibility must be prevented.
		The RMP EIS must include provisions to implement the United States Environmental Protection Agency's (USEPAs) "No Degradation" policy under the Clean Air Act (CAA).

Air Quality Comment Summary (continued)

Letter #	Author	Comment
KSL-0006	Defenders of Wildlife, The Wilderness Society, Wyoming Outdoor Council, Wyoming Wilderness Association, Upper Green River Valley Coalition, American Lands Alliance	The EIS should consider and include mitigation measures that will prevent National Ambient Air Quality Standards (NAAQS) violations, and ensure no degradation of visibility on high altitude lakes.
		Given the potentially severe adverse health effects associated with fine particle exposures, the EIS must fully assess the potential adverse public health effects associated with cumulative emissions of fine particles and fine particle precursors from the current and proposed sources of fine particles. In addition, the RMP EIS must identify any current or potential large increases in exposure to fine particles (FP) from background concentrations of 19 to 42 micrograms per cubic meter ($\mu\text{g}/\text{m}^3$).
KSL-0032	EOG Resources	[Management Situation Analysis (MSA)] Concentrations of nitrogen-containing pollutants were measured at Centennial and Rocky Mountain National Park. Although the park is in the state of Colorado, the location of Centennial is not specified and brings the relevancy of the text into question.
		[MSA] Ozone was measured at the Green River Basin Visibility Site and at Pinedale. Although a measurement was given for the former site, there was none given for Pinedale. Which measurement, assuming both measurements were contained in the text, would be considered baseline?
		[MSA] References were made to two measurements of particulate matter in two different counties. Just one measurement was described in the text, and the reader is provided no explanation of what is considered to be the baseline.
		[MSA] The BLM must perform an adequate regional analysis to demonstrate that future impacts resulting from oil and gas development would not significantly impact air quality.
		The BLM should recognize in the EIS that emissions associated with oil and gas development are regulated by the Wyoming DEQ and that the BLM defers regulation of emissions to its authority.
KSL-0033	The Pittsburg & Midway Coal Mining Co.	There appears to be inconsistencies with the management practices listed within the MSA document. The document places management of air quality under the jurisdiction of the Wyoming DEQ/Air Quality Division. The plan recognizes other divisions within Wyoming DEQ except the Land Quality Division (LQD).

Air Quality Comment Summary (continued)

Letter #	Author	Comment
KSL-0034	National Wildlife Federation, Greater Yellowstone Coalition, Defenders of Wildlife, The Wilderness Society, Wyoming Outdoor Council	BLM should determine what the desired outcome(s) from oil and gas leasing, exploration, and development activities are, particularly with reference to the desired outcome(s) for the prevention of air and water pollution.
		The RMP must manage actions on public lands to meet the air quality standards prescribed by Federal, State, and local laws.
		BLM should take a proactive approach to managing air quality by, among other things: gathering baseline air quality data; setting aggressive standards; requiring any actions on public lands to meet those standards (i.e. no flaring, no two-stroke engine use on public lands, etc.); analyzing the cumulative impact of any proposed action with other past, present, and reasonably foreseeable actions; establishing an effective monitoring program; and halting any actions that contribute to air pollution if such monitoring reveals that standards have been exceeded.
		The EIS should address the issue of regional haze and the destruction of viewsheds caused by haze.
		The EIS should address how prevention of significant deterioration requirements can be met, and the RMP should require steps to ensure they are met.
		Oil and gas development activities directly contribute to air pollution in several ways, and all should be addressed in the RMP EIS.
		Address the problem of global warming and the steps BLM can take to reduce this problem.

Cultural Resources Comment Summary

Letter #	Author	Comment
KSL-0004	Wyoming Department of State Parks and Cultural Resources, State Historic Preservation Office (SHPO)	Survey, evaluate, and protect significant historic, cultural, and archeological resources.
		Provide an in depth overview and situational analysis of Kemmerer BLM managed cultural resources. A critical part of this analysis should be a discussion, supported by appropriate comparison charts, that indicates how well the Kemmerer BLM achieved the cultural resources program goals of the current (1986) RMP, relative to new goals (if any) that will be established by this revision, and what remains unchanged and/or unaccomplished from the 1986 RMP.
KSL-0005	Anadarko Petroleum Corp.	The existing RMP decisions regarding protection measures for National Historic Trails should remain in effect until such time that Wyoming Historic Trail Management Plan is completed, subject to public review, and amended into the new RMP.

Cultural Resources Comment Summary (continued)

Letter #	Author	Comment
KSL-0006	Defenders of Wildlife, The Wilderness Society, Wyoming Outdoor Council, Wyoming Wilderness Association, Upper Green River Valley Coalition, American Lands Alliance	Consider the <i>relative</i> value of the resources involved. By this legally required measure, rare, unique, and sensitive native species have a relative value far in excess of more common or easily replaced public land resources, or resources that can be provided from other lands. The same is true of many other resources, such as cultural and wilderness resources. Accordingly, the alternative plans that are developed, and particularly the preferred alternative, must give special emphasis to protecting and providing for relatively rare resources.
		Protect the quality of scientific, scenic, historical, ecological, environmental, air and atmospheric, and water resource, as well as archeological values.
		BLM's multiple-use mandate requires land managers to consider the value of cultural resources in their decision-making process.
		Analyze the impacts of livestock on archeological, cultural, and historic resources.
KSL-0010	National Trust for Historic Preservation	Take greater responsibility for evaluating and protecting cultural resources.
		Survey land for cultural resources that have not been previously identified or evaluated.
		Develop proactive measures to protect cultural resources from mineral development.
		Incorporate specific cultural management plans into alternative development.
		Outline cultural issues and potential areas of interest at outset of RMP process.
		Engage in consultation with Native Americans early in planning process to address concerns and identify culturally significant areas.
		Integrate President Bush's "Preserve America" stewardship mandates into the RMP.
		Integrate Section 110 of the National Historic Preservation Act (NHPA) into the RMP process by identifying, evaluating, and nominating properties to the National Register of Historic Places.
		Adopt specific measures to protect cultural resources from artifact collectors, looters, and vandals.
		Ensure that allowed uses within the area will not diminish BLM's ability to identify and protect historic properties in the future.
Adopt "no surface occupancy (NSO)" restrictions and additional necessary stipulations for leases, in order to avoid and minimize potential adverse effects on cultural and historic properties.		

Cultural Resources Comment Summary (continued)

Letter #	Author	Comment
KSL-0010 (continued)	National Trust for Historic Preservation	Identify all threats to cultural resources and the natural condition of public lands (including off-highway vehicle [OHV] and other recreational activities).
		Follow mandates in BLM's Cultural Resource Management Plan (CRMP) manual.
		Establish as a goal the protection, conservation, and, where appropriate, restoration, of archeological and historic sites and landscapes in the Kemmerer field area.
		Determine the sites or areas that are most vulnerable to current and future adverse impacts and adopt management actions necessary to protect, conserve, and restore cultural resources.
		Outline specific management actions, such as stabilization, fencing, signage, closures, or interpretative development, to protect, conserve and, where appropriate, restore cultural resources.
		BLM should comply with Section 106 of the NHPA prior to designating areas for OHV use.
		Attach cultural resource restrictions and stipulations for areas open for oil and gas development outside of the buffer zone protection area.
KSL-0012	Biodiversity Conservation Alliance	The BLM should consult with the tribes indigenous to the Kemmerer Planning Area
KSL-0029	W & M Thoman Ranches, LLC	Local custom and culture should be preserved and not used as a means to cause hardship or elimination of one multiple use. (for example, sheepherder monuments should be recognized as such and not treated as Indian artifacts when they are not).
		Viewsheds and distances from established trails should not be unreasonable and cause economic hardship or hamper efforts to develop better overall management plans for the resource. The archeological clearance process should be streamlined (in terms of time and visits to the field) and all clearances for any multiple use management plans/projects should be done on a team approach basis so that all issues are addressed equally.
KSL-0033	The Pittsburg & Midway Coal Mining Co.	The BLM needs to improve their appropriations and manpower with regard to the workload for cultural inventories in order to carry out their responsibilities in a timely fashion for reviewing projects.

Cultural Resources Comment Summary (continued)

Letter #	Author	Comment
KSL-0034	National Wildlife Federation, Greater Yellowstone Coalition, Defenders of Wildlife, The Wilderness Society, Wyoming Outdoor Council	Other areas that should be considered for ACEC designation are: big game wintering areas, migration and other ecological corridors, and areas with special breeding, feeding or sheltering value for wildlife, such as cliff areas used by raptors, prairie dog colonies, and caves. Areas of large, contiguous habitat, should also be considered for ACEC designation. Archeological, historical, and paleontological sites and resources should be protected through the liberal use of ACEC designations, as required by FLPMA.
		Archeological, paleontological, and historical resources must be adequately protected.
		The EIS should consider that oil and gas drilling is not appropriate in potential wilderness areas, Areas of Critical Environmental Concern (ACECs), important wildlife habitat, and in areas with important archeological, historical, or paleontological resources due to the great relative value of the resources involved.
		BLM should recognize and analyze the significant adverse impact of livestock grazing on cultural resources and fulfill its obligation to identify and proactively protect cultural resources.
		Consider the value of cultural resources in their decision-making process.
		The required inventories and programs can – and should – serve to identify areas of resource sensitivity and should be used proactively by the BLM.
		The BLM must specifically request the views of tribal officials, and must solicit the views of traditional leaders or religious leaders. BLM must be diligent in its pursuit of this information.
		Identify areas where cultural sites are at risk, and the RMP should employ one or more of these administrative measures to protect these resources.
		Specify a travel plan for OHVs that limits vehicle travel to routes that do not pass near culturally sensitive areas.
		Address the impacts of oil and gas exploration and development activities on cultural resources.
KSL-0045	William R. Taliaferro	Cultural resources have been a large impediment to business and for improving and even maintaining improvements within the area.
		Thank goodness there is private and state land in the area so these resources could be excavated sold and displayed otherwise it would remain buried.

Fire Management Comment Summary

Letter #	Author	Comment
KSL-0003	State of Wyoming, DEQ	Address impacts from using fire as a management tool.
		Address impacts from fire (smoke, public health, etc.).

Fire Management Comment Summary (continued)

Letter #	Author	Comment
KSL-0006	Defenders of Wildlife, The Wilderness Society, Wyoming Outdoor Council, Wyoming Wilderness Association, Upper Green River Valley Coalition, American Lands Alliance	Establish an ecologically based fire <i>restoration</i> program so that fire can play its natural, and necessary, role in the RMP area.
		Prohibit road building as a means to accomplish any vegetation treatments in furtherance of the fire policy. If “non-permanent” roads are allowed, there should be stringent assurance they will in fact be temporary.
		Be consistent with the Western Governors Association’s 10-year Comprehensive Wildfire Strategy prepared in 2001.
		Funds for fire management should be used, in accordance with our recommendations on invasive and exotic species, to eradicate flammable invasive species such as cheatgrass and restore native species.
		Provide that riparian areas should be restored so that they can serve as natural firebreaks.
		Provide that fire suppression efforts and related vegetation management efforts (like thinning) are focused on the “wildland urban interface.”
KSL-0012	Biodiversity Conservation Alliance	The Kemmerer RMP revision should institute a natural fire policy in place of controlled burns.
KSL-0018	Sam Bennion	Wants more prescribed burns in areas.
KSL-0021	Edward M. Bown	The RMP should recognize the need to maintain the ecological role of fire in promoting stand renewal in the sagebrush steppe and aspen/mountain brush vegetation types. Prescribed fire and other vegetation treatments should be available to assure that the natural plan succession processes are maintained to provide biological diversity and productivity on range landscapes.
KSL-0028	Sweetwater County Conservation District	The ecological role of fire should be maintained to promote stand renewal in the sagebrush steppe and aspen/mountain brush vegetation types. Prescribed fire and other vegetation treatments should be available to assure that the natural plan succession processes are maintained to provide biological diversity and productivity on range landscapes.
		There should be cooperation and coordination with other land management agencies, such as the United States Forest Service (USFS), regarding forestry health, forest restoration, and fires.
KSL-0029	W & M Thoman Ranches, LLC	The RMP should recognize the need to maintain the ecological role of fire in promoting stand renewal in the sagebrush steppe and aspen/mountain brush vegetation types. Prescribed fire and other vegetation treatments should be available to assure that the natural plant succession processes are maintained to provide biological diversity and productivity on range landscapes.

Fire Management Comment Summary (continued)

Letter #	Author	Comment
KSL-0029 (continued)	W & M Thoman Ranches, LLC	There are forest health and fire issues in the Kemmerer RMP area and they should be dealt with on a proactive basis.
KSL-0034	National Wildlife Federation, Greater Yellowstone Coalition, Defenders of Wildlife, The Wilderness Society, Wyoming Outdoor Council	The RMP must not allow reseeding or surface-disturbing restoration after fires in areas with special status plant species.
		Prioritize areas of which fire could improve the vegetation communities and then allow natural fires to burn in these areas.
		It is crucial that the RMP establish an ecologically based fire restoration program so that fire can play its natural, and necessary, role in the RMP area.
		Provide that fire suppression efforts and related vegetation management efforts (like thinning) are focused on the “wildland urban interface.”
		Be consistent with the Western Governors Association’s 10-year Comprehensive Wildfire Strategy prepared in 2001.
		Provide that funds for fire management should be used.
		Provide that riparian areas should be restored so that they can serve as natural firebreaks.
		EIS should address underlying assumptions or conditions that influence fire policy in a thorough and scientifically credible manner.
KSL-0041	Unknown	The use of “controlled burns” benefits everything but wildlife.
KSL-0042	Samuel O. Bennion	More controlled burns need to be done. One season should be enough to miss after controlled burns.
KSL-0045	William R. Taliaferro	More fires should be allowed to burn rather than expend resources to put them out. Save the structures but let more areas burn so that monster fires are avoided in the future.
KSL-0048	Wayne Burkhardt	The RMP should recognize the need to maintain the ecological role of fire in promoting stand renewal in the sagebrush steppe and aspen/mountain brush vegetation types. Prescribed fire and other vegetation treatments should be available to assure that the natural plant succession processes are maintained to provide biological diversity and productivity on range landscapes.
KSL-0054	Edward M. Bown, Diamond W Ranch Co., Inc., Rees Land & Livestock Co., JW Ranching Co., Inc., K-Ron Ranch, LLC	The RMP should recognize the need to maintain the ecological role of fire in promoting stand renewal in the sagebrush steppe and aspen/mountain brush vegetation types. Prescribed fire and other vegetation treatments should be available to assure that the natural plan succession processes are maintained to provide biological diversity and productivity on range landscapes.

Fish and Wildlife Comment Summary

Letter #	Author	Comment
KSL-0005	Anadarko Petroleum Corp.	Discussion of potential stipulations regarding non-Endangered Species Act (ESA) species should recognize BLM’s lack of authority to enforce the stipulations or studies on private property.

Fish and Wildlife Comment Summary (continued)

Letter #	Author	Comment
KSL-0006	Defenders of Wildlife, The Wilderness Society, Wyoming Outdoor Council, Wyoming Wilderness Association, Upper Green River Valley Coalition, American Lands Alliance	BLM should determine what the desired outcome(s) from oil and gas leasing, exploration, and development activities are, particularly with reference to the desired outcome(s) for endangered species protection, migratory wildlife, non-migratory wildlife, prevention of habitat fragmentation.
		Mitigation of impacts to fish and wildlife resources is assuming ever-increasing importance in project planning, especially as the rate of potentially damaging development across our public lands increases.
		Protect the quality of scientific, scenic, historical, ecological, environmental, air and atmospheric, and water resource, as well as archeological values.
		Withdraw environmentally sensitive areas from oil and gas leasing.
		Any reasonably foreseeable development (RFD) scenario development must be based on baseline data and ongoing monitoring. Accordingly, the BLM must set forth the following: Baseline data on wildlife including, but not limited to, the pronghorn antelope, mule deer, elk, moose, bighorn sheep, sage grouse, mountain plover, prairie dogs, black-footed ferrets, the array of raptors, and all species listed on the BLM's sensitive species list that are present within the Kemmerer Resource Area; Data from past, current, and ongoing monitoring of air and water quality; Data from past, current and ongoing wildlife studies including, but not limited to, studies with respect to pronghorn antelope, mule deer, elk, moose, bighorn sheep, sage grouse, mountain plover, prairie dogs, black-footed ferrets, the array of raptors, and all species listed on the BLM's sensitive species list that are present within the Kemmerer Resource Area.
		The report "Fragmenting Our Lands, the Ecological Footprint From Oil and Gas Development" should be considered. BLM must ensure its analyses of impacts to wildlife consider indirect, connected, related, long-term, and cumulative impacts in as quantitative, and scientifically supported, a manner as possible.
		Ensure wildlife diversity.
		To avoid and minimize the adverse impacts of development the EIS should contain a provision requiring that there be no net loss of big game transitional and winter ranges throughout the Kemmerer Resource Area.

Fish and Wildlife Comment Summary (continued)

Letter #	Author	Comment
KSL-0006 (continued)	Defenders of Wildlife, The Wilderness Society, Wyoming Outdoor Council, Wyoming Wilderness Association, Upper Green River Valley Coalition, American Lands Alliance	One potential method for ensuring no net loss would be to require off-site mitigation. The RMP EIS must therefore fully explore this possibility.
		The RMP must discuss the impacts of population growth that accompanies oil and gas development on the wildlife species on the Upper Green River Valley. This discussion should include an analysis of potential increases in wildlife law violations, the actual impact these violations have on animal population sizes, opportunities for education-oriented conservation measures, and opportunities to mitigate the impacts of increased populations on wildlife species.
		Recover the white-tailed prairie dog and its habitat needs.
		Protect the imperil sage grouse.
		Just days before scoping comments were due, the Committee for the High Desert, American Lands Alliance, Biodiversity Conservation Alliance, the Center for Native Ecosystems, and the Oregon Natural Deserts Association, filed a petition to list the Pygmy rabbit under the ESA. The BLM needs to incorporate the appropriate protection measures into the RMP EIS to protect this species and its habitat.
		The EIS should examine existing stipulations and protections to determine their effectiveness and to determine whether they should be modified so as to protect raptors.
		The EIS should examine whether habitat that could potentially be occupied by raptors, such as previously utilized nests, should receive protection so as to ensure the continued viability of raptors in the RMP area. It should consider all biological needs of raptors and develop suitable protections for all significant life-stages of the various raptors, all of which should be included in the RMP. Additionally, the EIS should address compliance with the Bald Eagle Protection Act and Migratory Bird Treaty Act and the RMP should specify the means by which BLM will ensure compliance with these laws as well as pursue (or facilitate) enforcement of them.
		The RMP must provide a list of species in the Resource Area, disclose monitoring, population, and habitat data in regard to each species and adopt mitigation measures to protect each of these species from any development approved by this RMP.
		Reclamation efforts throughout the Kemmerer Resource Area, including details regarding the total acres disturbed since the last RMP, the acreage successfully reclaimed, the definition of “successful reclamation,” and the acres where reclamation was attempted but failed.

Fish and Wildlife Comment Summary (continued)

Letter #	Author	Comment
KSL-0009	Wyoming Game and Fish Department (WGFD)	The Conservation Agreement and Strategy for Colorado River cutthroat trout in States of Colorado, Utah, and Wyoming, 2001 should be discussed and included in the RMP Revision.
		Address several native nongame fish species of concern that are found in waters within BLM lands.
		The BLM should also address concerns to protect the sport fisheries available to anglers. The economic benefits from fish and wildlife should be included within this RMP.
		Habitat requirements necessary to protect the status of all native amphibians should be addressed within this document.
		Plans and reports that are applicable: Conservation Agreement and Strategy for Colorado River cutthroat trout in the States of Colorado, Utah and Wyoming; Conservation and Management Plan for Three Fish Species – Roundtail chub, Bluehead sucker, Flannelmouth sucker; Management Consideration for native nongame fishes of Wyoming – Native Nongame Fishes Conservation Assessment, Feb 2003, WGFD Administrative Report.
		The RMP should address the foreseeable level of coalbed methane development and the probable impacts on fisheries and aquatic habitats. This should include habitat fragmentation, associated roadway impacts (such as erosion resulting in sedimentation to both ephemeral and perennial waterways) and other cumulative impacts associated with mineral, oil or gas extraction. The RMP should also address mitigation approaches to minimize these impacts.
		The effect of roads on aquatic resources is a concern. Road management should be addressed in the RMP, particularly in reference to identifying best management practices that reduce erosion and surface runoff resulting from road construction.
KSL-0012	Biodiversity Conservation Alliance	The Kemmerer RMP revision should require adequate protection for sage grouse.
		The Kemmerer RMP revision should require adequate protection for prairie dogs.
		The Kemmerer RMP revision should adequately protect big game crucial ranges.
		The Kemmerer RMP revision should adequately protect raptor nesting habitat.
		The Kemmerer RMP revision should identify and protect mountain plover nesting habitat.
		The Kemmerer RMP revision should protect populations of rare native warmwater fishes.

Fish and Wildlife Comment Summary (continued)

Letter #	Author	Comment
KSL-0012 (continued)	Biodiversity Conservation Alliance	The Kemmerer RMP revision should mandate directional drilling to reduce wildlife habitat impacts.
		The new RMP should consider the forthcoming Heart of the West Wildland Network Design and be compatible with its recommendations.
		The Kemmerer RMP should include a comprehensive survey of the Field Office for pygmy rabbits, and identified habitats should be protected by NSO stipulations and a moratorium on sagebrush eradication or reduction programs.
		The new RMP should provide measures that protect the habitat of indigenous populations of Bonneville and Colorado River cutthroat trout. Protective measures should ensure that sediment loading does not occur in streams inhabited by these two subspecies, that surface-disturbing activities do not take place on floodplains, that riparian vegetation achieves Properly Functioning Condition and is not overgrazed, and that toxic coalbed methane wastewater and other pollutants are not discharged into waterways containing these populations.
		The new RMP should consider the forthcoming Heart of the West Wildland Network Design and be compatible with its recommendations.
KSL-0013	Wyoming Department of Agriculture	Consider impacts to the land from wildlife and horses.
KSL-0016	Norris Tratnik	Any proposed type of conversion which includes winter-use areas for sage grouse must be carefully considered. An on-the-ground survey of sage grouse winter distribution during peak snow conditions should be done before approval is given for conversion. All known sage grouse wintering areas should receive priority attention concerning the control of wildfires and prescribed burns.
		More water sources need to be made available for sage grouse and wildlife. All livestock water troughs should have installed bird ramps.
		All water systems used by livestock should be left on – not emptied – when livestock have been moved. Some spring drinking water sources in meadow vegetation should be fenced, and water should be piped to an outside stock watering trough.
		It is also desirable to have vegetation cover in areas where sage grouse come to water; these areas may include up to five acres that need to be fenced.
KSL-0018	Sam Bennion	BLM has got to manage wildlife numbers to responsibly manage the range production.

Fish and Wildlife Comment Summary (continued)

Letter #	Author	Comment
KSL-0023	Arnold Larson	Predators need to be monitored and accounted for damages caused.
		Cross fencing to better manage range.
KSL-0029	W & M Thoman Ranches, LLC	Wildlife should be managed for existing resources and other multiple uses. The BLM should not allow resource damage because of unrealistic wildlife populations. Conflicts with other uses should be resolved through a locally lead, collaborative management process and public education program.
KSL-0031	Matthew W. Krall	All that can be said of the grazing issue is that some areas see none yet critical habitats for animals and birds such as leks are being grazed to the point of decimation of lek populations.
		Management strategies should include removal of allotment fences, protection of critical and sensitive areas and a 3-fold management plan triangulated between the BLM, USFS, and the WGFD.
KSL-0033	The Pittsburg & Midway Coal Mining Co.	The Wyoming DEQ/LQD permits mineral activity through consultation and approval with the WGFD, BLM, United States Fish and Wildlife Service (USFWS), yet we find increased and conflicting regulatory burdens being placed by the BLM for wildlife concerns on the same activities after the fact.
		The crucial winter habitat map is a generalization that covers vast expanses of the resource area. Where detailed monitoring information is available and indicates otherwise, the boundaries should be adjusted to properly portray the actual crucial winter habitat for big game species.
		It appears that the BLM goes beyond habitat management and enters into species management when they begin to dictate distances to nests or leks. For example, the distances being imposed are those found within the BLM's own guidelines for managing sage grouse. If the BLM is managing habitat for the benefit of the species then the distances should be decreasing instead of increasing over the State plan.
		The restrictions imposed by fences are closely associated with serious safety issues. Alternate means of allowing migration by wildlife, essentially big game animals, may be a better consideration than altering fence designs.

Fish and Wildlife Comment Summary (continued)

Letter #	Author	Comment
KSL-0034	National Wildlife Federation, Greater Yellowstone Coalition, Defenders of Wildlife, The Wilderness Society, Wyoming Outdoor Council	In revising this RMP, BLM should consider, analyze, and wherever appropriate facilitate, international efforts to prevent environmental decline. These include a number of international agreements and treaties for resource protection, such as United Nations biosphere reserves, migratory bird treaties, the Convention on International Trade in Endangered Species, and international efforts related to biological diversity preservation, among others.
BLM should determine what the desired outcome(s) from oil and gas leasing, exploration, and development activities are, particularly with reference to the desired outcome(s) for endangered species protection, prevention of habitat fragmentation.		
All riparian areas in the geographic area of the RMP be designated ACECs.		
Other areas that should be considered for ACEC designation are: big game wintering areas, migration and other ecological corridors, and areas with special breeding, feeding or sheltering value for wildlife, such as cliff areas used by raptors, prairie dog colonies, and caves. Areas of large, contiguous habitat, should also be considered for ACEC designation. Archeological, historical, and paleontological sites and resources should be protected through the liberal use of ACEC designations, as required by Federal Land Policy and Management Act (FLPMA).		
The EIS should consider that oil and gas drilling is not appropriate in potential wilderness areas, ACECs, important wildlife habitat, and in areas with important archeological, historical, or paleontological resources due to the great relative value of the resources involved.		
The EIS should consider the problem of produced water storage pits/reservoirs leading to concentrated chemical solutions that harm wildlife (or other resources), and should particularly consider compliance with the Migratory Bird Treaty Act in this regard.		
The issue of the impact of power lines on birds and bats should be addressed, particularly with regard to raptors.		
The impacts rights-of-way have on habitat fragmentation must be analyzed in the EIS, and provision made to avoid or mitigate these impacts in the RMP.		

Fish and Wildlife Comment Summary (continued)

Letter #	Author	Comment
KSL-0034 (continued)	National Wildlife Federation, Greater Yellowstone Coalition, Defenders of Wildlife, The Wilderness Society, Wyoming Outdoor Council	The RMP should prohibit OHV use in critical wildlife habitat, winter range, areas critical for nesting, breeding or other reproductive behaviors, and habitat for threatened, endangered or sensitive species.
		The BLM should consider that rivers and streams in the RMP area are of tremendous importance to the wildlife and fish, and the beauty and recreational appeal of the area.
		BLM must ensure its analyses of impacts to wildlife consider indirect, connected, related, long-term, and cumulative impacts in as quantitative, and scientifically support, a manner as possible.
		Relative to big game, we urge the BLM to protect more than “critical” big game winter ranges.
		Examine existing stipulations and protections to determine their effectiveness and to determine whether they should be modified so as to protect these magnificent birds.
		The EIS should examine whether habitat that could potentially be occupied by raptors, such as previously utilized nests, should receive protection so as to ensure the continued viability of raptors in the RMP area.
		Reexamine whether these types of stipulations are sufficient, standing alone, to protect the viability of sage grouse populations.
		The EIS should consider whether other types of stipulations are needed (including NSO), and also whether stipulations and protections are required for ongoing operations so as to effectively protect wildlife.
		The plan must provide for protecting certain species to ensure that biological diversity is protected.
		Prairie dogs are an example of a keystone species that demand special management efforts.
		The EIS must carefully evaluate problems resulting from habitat fragmentation and the need for maintaining the connectivity or linkage of habitats.
		The RMP must limit habitat fragmentation resulting from road building, protect current roadless areas, provide for aggressively closing unneeded or ecologically destructive roads, and provide for maintaining needed roads so as to reduce negative environmental impacts.
		Consider the principles of island biogeography.
		Identify all existing migration and other movement corridors.
Consider and enunciate in the RMP a policy relative to habitat “edge.”		
Establish a program or at least guidance for how BLM will attempt to work with other landowners relative to biodiversity protection efforts.		

Fish and Wildlife Comment Summary (continued)

Letter #	Author	Comment
KSL-0034 (continued)	National Wildlife Federation, Greater Yellowstone Coalition, Defenders of Wildlife, The Wilderness Society, Wyoming Outdoor Council	Development of an effective monitoring program that measures biodiversity and wildlife populations, soil erosion, vegetation health, the presence of non-native species, water quality and quantity, and the impacts of other uses such as grazing, OHVs, recreation uses, and other activities.
		Roadless areas, ACECs, unique wildlife habitats, and other special management areas should not be deemed suitable for coal mining.
KSL-0036	Mark Fruechte	Set a policy that requires developers to develop an equal amount of land they use and set it aside as a wildlife sanctuary.
KSL-0037	Phillip Krall	The oil and gas companies should have to do some habitat mitigation projects.
KSL-0041	Unknown	OHV's destroy crucial habitat.
		The use of "controlled burns" benefits everything but wildlife.
		Declining sage grouse numbers and habitat.
		Roads to oil/gas wells need to be minimized as to length and numbers and reclamation of those areas need to be restored for the wildlife habitat.
KSL-0042	Samuel O. Bennion	The wildlife numbers (deer elk antelope) are above objective in the west Green River area and have been through the last 4 or 5 drought years.
		The BLM has and is managing the grazing forage with the livestock numbers while wildlife numbers are never adjusted. BLM should compensate for the private animal unit months (AUMs) that they do not allow to be used when they close allotments or shorten grazing seasons.
KSL-0045	William R. Taliaferro	If we allow the "native species" mentality to permeate wildlife management we'll eventually end up with poor fisheries, a few cutthroat trout and the trash fish of the past.
		Too many elk are wintered in the area and too many antelope summered in the area.
KSL-0047	Nathan G. Maxon	R116W, Sections 11, 14, 15, this reach of Willow Creek is home to Colorado river cutthroat trout. Grazing and extirpation of beaver has left this riparian area in very poor condition. This area should receive some consideration for habitat improvement, such as a reduction of the AUMs and fencing. It might also be beneficial to the trout if beaver were re-established throughout this reach.

Fish and Wildlife Comment Summary (continued)

Letter #	Author	Comment
KSL-0047 (continued)	Nathan G. Maxon	The areas delineated by the WGFD as critical deer and antelope winter range should be respected. But well should be spaced at low densities such as 80 acres per well pad if drilling is going to occur in the summer.
		It might be wise to implement seasonal mitigation effort for windmills. The overthrust belt is a known raptor migration corridor. During the spring and fall migrations many collisions could occur.
		Wildlife would do better with better forage. This means fewer AUMs permitted on allotments.
KSL-0050	Facilitated Notes	Predator control for protection of sage grouse.
		Do not list sage grouse.
		Hunt predatory animals and control of wolves in planning area.
		Wildlife numbers must be managed to responsibly manage the range.
		Manage AUMs – grazing/livestock, but not wildlife numbers
		Concern that BLM is not managing according to the Sage Grouse Management guidelines.
KSL-0052	Facilitated Notes	Concern that BLM does not follow State (WGFD) recommendations for sage grouse protection – BLM increases the restriction.
		Wheat Creek Meadows – How will resources be managed to improve conditions? Public access for wildlife observation, while still protecting habitat; many swales/ruts of Sublette cutoff and Dempsey-Hockaday Trail are within area and should be protected and interpreted; improve livestock control and season of grazing use.

Geology Comment Summary

Letter #	Author	Comment
KSL-0006	Defenders of Wildlife, The Wilderness Society, Wyoming Outdoor Council, Wyoming Wilderness Association, Upper Green River Valley Coalition, American Lands Alliance	Require that the BLM to thoroughly examine the impacts set forth in, <i>Guidance on Adequately Evaluating the Impacts of Site Specific Seismic Exploration Projects</i> , before approving any further seismic activities in the Upper Green River Valley.
		Prohibit seismic exploration activities in areas closed to oil and gas development and in crucial and sensitive wildlife habitat.
		Continue to seasonally restrict seismic exploration activities during times when such activity would adversely impact wildlife.
		Require operators to provide an <i>adequate</i> bond before beginning seismic project. Adopt stringent reclamation standards and only release bonds when these standards have been met.

Lands and Realty Comment Summary

Letter #	Author	Comment
KSL-0001	Bjork, Lindley, Little, PC	Provide realistic opportunities for the development of oil and natural gas on federal lands with only necessary restrictions on surface use.
KSL-0005	Anadarko Petroleum Corp.	Specify in the RMP if and how valid existing lease rights could be impacted by the new leasing decisions.
		Ensure the rights of private land owners are adequately accounted for.
		Discussion of potential stipulations regarding non-ESA species should recognize BLM's lack of authority to enforce the stipulations or studies on private property.
KSL-0006	Defenders of Wildlife, The Wilderness Society, Wyoming Outdoor Council, Wyoming Wilderness Association, Upper Green River Valley Coalition, American Lands Alliance	Place a moratorium on leasing during the RMP revision process.
		Withdraw environmentally sensitive areas from oil and gas leasing.
		Place non-surface occupancy stipulations on all future leases issued.
		Disclose why lease rights have not expired.
		Prohibit leasing when the RFD has been exceeded.
		Guide and regulate the configuration of timing of lease offerings.
		Monitor and enforce lease acreage limits.
		The BLM must adopt a RFD scenario that balances energy development with the protection of other valuable natural resources. If the BLM fails to do so, the valley could be turned into a single continuous gas field in violation of FLPMA's multiple-use mandate and a number of other federal environmental laws.
		Which lands have been leased, the stipulations that attach to these leases, and when the leases will expire.
		Which leased lands lay within project area boundaries and how much acreage this consumes.
		While the split-estate issue in the Kemmerer Resource Area is smaller than that in some BLM Resource areas in Wyoming, this is still an issue and major concern because private landowners who live on "split estates" are often severely affected by BLM's oil and gas leasing decisions.
		If the BLM fails to withdraw private surface lands from oil and gas leasing, the RMP should include a discussion of and adopt landowner protections provisions that condition development to protect private surface owners who could be adversely affected by oil and gas development.
Ensure landowner participation in oil and gas leasing, exploration, and development decisions.		
While developing the <i>draft</i> RMP EIS, the BLM should review and make full use of the provisions in the Surface Mining Control and Reclamation Act, 30 United States Code (USC) §§ 1221 to 1230a, that apply to protect surface owners with federal minerals estates underneath their land.		

Lands and Realty Comment Summary (continued)

Letter #	Author	Comment
KSL-0006 (continued)	Defenders of Wildlife, The Wilderness Society, Wyoming Outdoor Council, Wyoming Wilderness Association, Upper Green River Valley Coalition, American Lands Alliance	The RMP should thus set forth strict inspection and enforcement guidelines inspecting the well sites quarterly, with at least one unannounced visit annually. All inspection findings will be kept in writing and made available to the public. In addition, BLM needs to back up its inspection findings with strict enforcement, including lease cancellation pursuant to 43 Code of Federal Regulations (CFR) § 3163.1(a)(5) and all civil and criminal penalties in 43 CFR Subpart 3163.
		The RMP EIS must address the issue of granting exemptions and exceptions to both lease stipulations <i>and</i> other protective measures at the application for permit to drill (APD) stage. At a minimum, the RMP must identify which stipulations cannot be relaxed and the specific conditions that must be met before a request to exempt or relax any of the others will be granted.
		Rights-of-way are often part-and-parcel of energy development projects, as well as many other activities. All provisions in the Mineral Leasing Act and FLPMA must be adhered to relative to rights-of-way to help ensure environmental protection.
		R.S. 2477 claims should not be processed until the Department of the Interior (DOI) can clarify the relationship of the recent “Disclaimer of Interest Rule” to R.S. 2477 claims.
		Valid claims must show evidence of intentional physical construction, of a publicly used highway with some clear destination, on public lands that had not otherwise been reserved for public purposes. <i>Id.</i> Any determination of the validity of an R.S. 2477 claim should be an open process with full opportunities for public involvement and comment.
KSL-0008	Office of State Lands and Investments	Maintain access to lands (state and private) surrounded by BLM.
		Encourage multiple use practices on land.
		Manage with minimal regulations on land uses.
		Maintain access to state lands for mineral development.
KSL-0009	WGFD	Access to public lands is an issue, and management is easier if public lands are blocked up. The RMP should include and promote actions such as conservation easements and land exchanges to accomplish those purposes. Additionally, the RMP should consider access for anglers and hunters in realty actions.
KSL-0011	State of Wyoming, Office of the Governor	The BLM be sensitive to maintaining access to State trust lands isolated by lands under BLM’s jurisdiction, address the economic values of the mineral estate potential for the area, only revise those parts of the existing RMP which are “not working,” and maximize a balanced approach to the use of the area’s resources, minimizing regulation as much as possible. Continuous monitoring of impacts and mitigation effectiveness, and flexibility to manage adaptively, will be key issues.
KSL-0015	Wyoming Wilderness Association	The RMP revision should also address swapping of the state inholdings within the Raymond Mountain Wilderness Study Area (WSA).

Lands and Realty Comment Summary (continued)

Letter #	Author	Comment
KSL-0019	Ken Klinker	Unless very special circumstances exist, broad multiple use of the land should be allowed. The plan should start with this broad multiple use concept, they restrict it only where specific justification exists.
KSL-0021	Edward M. Bown	The RMP should provide for an accelerated land exchange program in the areas of checkerboard ownership or other small tract in-holdings.
KSL-0029	W & M Thoman Ranches, LLC	The resource should be managed for multiple use. One use should not be favored over another nor should one use cause the elimination or mismanagement of another over the long term.
KSL-0031	Matthew W. Krall	Recommend that all of the resource management area from Kemmerer, north and east of Hwy. 30 and north and west of Hwy. 189 be permanently closed to oil, gas, and methane activities and continuing into the Pinedale resource management area.
KSL-0034	National Wildlife Federation, Greater Yellowstone Coalition, Defenders of Wildlife, The Wilderness Society, Wyoming Outdoor Council	BLM should give specific attention to the purposes and needs for oil and gas related activities that will be analyzed in the EIS. BLM should address in detail what the purpose of future leasing, potential exploration, and development activities would be. These considerations should be made with explicit recognition of the relative value of the RMP area for meeting local, regional, and national energy needs and what alternatives exist for meeting those needs locally, regionally and nationally.
		BLM should determine what the desired outcome(s) from oil and gas leasing, exploration, and development activities are, particularly with reference to the desired outcome(s) for, the prevention of unnecessary or undue degradation of public lands, and the protection of surface owner rights on split-estate lands.
		BLM must ensure compliance with the land use planning requirements of FLPMA.
		It is crucial that lease stipulations that ensure necessary protection of public lands be developed and included in the RMP for attachment to all leases.
		The RMP should guide and regulate the configuration and timing of lease offerings when parcels are offered for lease.
		The RMP should explicitly prohibit oil and gas leasing whenever the RFD scenario has been exceeded, especially if this development is occurring due to new technological innovations that have not been subject to adequate environmental review. Leasing should not proceed until updated environmental analyses are completed.
		BLM must minimize conflicts between surface owners and companies developing subsurface minerals by proactively seeking and addressing their concerns in the design and review of projects, including leasing itself.
		BLM should use its general authority to condition development and to protect private surface owners who could be adversely affected by oil and gas development.

Lands and Realty Comment Summary (continued)

Letter #	Author	Comment
KSL-0034 (continued)	National Wildlife Federation, Greater Yellowstone Coalition, Defenders of Wildlife, The Wilderness Society, Wyoming Outdoor Council	The RMP should require that existing rights-of-way, with similar types of structures, be utilized to the extent possible.
		The impacts rights-of-way have on habitat fragmentation must be analyzed in the EIS, and provision made to avoid or mitigate these impacts in the RMP.
		The RMP should defer determining the validity of R.S. 2477 right-of-way claims until there is a generally applicable unambiguous legal requirement for BLM to do.
		Establish a program or at least guidance for how BLM will attempt to work with other landowners relative to biodiversity protection efforts.
		A prohibition on the issuance of rights-of-way in riparian and wetlands areas, or in areas where such use would adversely impact riparian areas.
		Identification of lands for acquisition in riparian or wetlands areas that are ecologically, hydrologically or geologically linked to BLM wetlands and crucial to their functioning.
KSL-0035	Robert A. Greene	The BLM should consider transfer of isolated land parcels to groups like the Nature Conservancy and Wyoming State Parks.
KSL-0041	Unknown	The multiple use concept is being abused to the utmost by certain groups. Public lands, such as the Jowah Field, up by Pinedale have become overrun by industry and now have become so polluted that considerations are underway to close this land to the public.
		Recreation on public lands needs to take precedence on public lands under the “multiple use concept.”
KSL-0045	William R. Taliaferro	It’s impossible to get land trades or sales completed because of the cost incurred by the government for cultural resources and endangered species studies.
KSL-0047	Nathan G. Maxon	A committee of unbiased citizens should be enlisted to make qualitative assessments of all land parcels involved in swaps. This would help ensure that fair trades are made.
KSL-0048	Wayne Burkhardt	The RMP should provide for an accelerated land exchange program in the areas of checkerboard ownership or other small tract in-holdings.
KSL-0054	Edward M. Bown, Diamond W Ranch Co., Inc., Rees Land & Livestock Co., JW Ranching Co., Inc., K-Ron Ranch, LLC	The RMP should provide for an accelerated land exchange program in the areas of checkerboard ownership or other small tract in-holdings.

Livestock Grazing Comment Summary

Letter #	Author	Comment
KSL-0006	Defenders of Wildlife, The Wilderness Society, Wyoming Outdoor Council, Wyoming Wilderness Association, Upper Green River Valley Coalition, American Lands Alliance	Ensure monitoring to assess whether standards or guidelines for range health are being met.
		Complete a site-specific impacts analysis, determine suitability, and balance resource use.
		Insure livestock grazing does not adversely impact fragile resources such as riparian areas.
		With respect to grazing insure adherence to the Clean Water and Safe Drinking Water Act.
		Analyze the impacts of livestock on archeological, cultural, and historic resources.
		Analyze the economic impacts of livestock grazing.
KSL-0012	Biodiversity Conservation Alliance	The Kemmerer RMP revision should minimize fences on public lands, remove unpermitted fences, and bring all fences into compliance with WGFD standards.
KSL-0013	Wyoming Department of Agriculture	Discuss effects of BLM management actions on grazing activities.
		Discuss the economic effect of management actions on agricultural producers and local community.
		Discuss the cumulative impacts to ranchers.
		Coordinate with ranchers.
		Consider impacts to the land from wildlife and horses.
KSL-0015	Wyoming Wilderness Association	Work cooperatively with public and interested stakeholders.
KSL-0015	Wyoming Wilderness Association	Raymond Mountain WSA has been overgrazed in the past decades. Fencing, water developments, and motorized use are discouraging the wilderness qualities of the area, thus, higher and better protections for the integrity of wilderness should be part of the RMP process. Grazing problems need to be addressed in the RMP.
KSL-0016	Norris Tratnik	Livestock should not be turned out until the second week in June. The forced movement or drives of cattle and sheep in the spring is reason for concern, as even a slight disturbance will cause hen sage grouse to abandon their nests while laying in mid-April through middle-May.
		Why has the BLM allowed such extensive overgrazing on the Cumberland allotment during the past three years?
		Resource Area has failed to address problems with livestock grazing on public lands.
KSL-0018	Sam Bennion	The BLM should have a plan to compensate for private AUMs that they do not allow private people to use (common use AUM).
KSL-0021	Edward M. Bown	The RMP should encourage the development of coordinated and cooperatively developed grazing management plans.

Livestock Grazing Comment Summary (continued)

Letter #	Author	Comment
KSL-0021 (continued)	Edward M. Bown	The RMP should provide for the construction and maintenance of management facilities necessary for the proper management of livestock grazing (pasture fences, water developments, vegetative treatments, etc.).
		The RMP should recognize livestock grazing as having economic significance and other benefits to local communities.
KSL-0023	Arnold Larson	Predators need to be monitored and accounted for damages caused.
		Cross fencing to better manage range.
		Grazing should continue.
KSL-0028	Sweetwater County Conservation District	Locally lead, collaborative efforts should be encouraged for the development of grazing and/or other pertinent management plans. The integrity of existing plans should be maintained (such as the Cumberland/Uinta AMP). The lands should be managed for multiple uses.
		Construction and maintenance of management facilities necessary for the proper management of livestock grazing (pasture fences, water developments, vegetative treatments, etc.) should be provided.
KSL-0029	W & M Thoman Ranches, LLC	The RMP should encourage the development of locally lead, collaborative efforts in the development of grazing management plans.
		The RMP should provide for the construction and maintenance of management facilities necessary for the proper management of livestock grazing (pasture fences, water developments, vegetative treatments, etc.). There should be no changes from the existing plan that would cause undue expense or hardship to any one permittee (changing fencing standards on existing fence, for example, or removing existing water developments).
		The RMP should recognize livestock grazing as having economic significance to local communities.
KSL-0031	Matthew W. Krall	All that can be said of the grazing issue is that some areas see none yet critical habitats for animals and birds such as leks are being grazed to the point of decimation of lek populations.
		Management strategies should include removal of allotment fences, protection of critical and sensitive areas and a 3-fold management plan triangulated between the BLM, USFS, and the WGFD.
KSL-0033	The Pittsburg & Midway Coal Mining Co.	Periodic reviews should be scheduled to reclass grazing allotments.

Livestock Grazing Comment Summary (continued)

Letter #	Author	Comment
KSL-0034	National Wildlife Federation, Greater Yellowstone Coalition, Defenders of Wildlife, The Wilderness Society, Wyoming Outdoor Council	The RMP should provide a clear and binding schedule for ensuring that the three steps the grazing rules establish for determining if grazing needs to be modified are accomplished in a timely manner.
		The BLM should consider what changes if any are needed to extend the standards and guidelines and Fundamentals of Rangeland Health to all other programs, and the RMP should provide for their adoption.
		The EIS should include the required analysis of site-specific impacts of grazing and the required discussion of the balancing of values.
		The EIS should determine the suitability of lands within the RMP area for livestock grazing and the RMP should require adjustments accordingly.
		The impacts of grazing on riparian areas should receive particular attention in the EIS, and the RMP should make binding and mandatory provisions to deal with the impacts of grazing in riparian areas.
		BLM should ensure there is sufficient water quality monitoring relative to the impacts of livestock grazing.
		BLM should recognize and analyze the significant adverse impact of livestock grazing on cultural resources and fulfill its obligation to identify and proactively protect cultural resources.
		BLM must review grazing allotments and address the protection of areas with threatened, endangered, or sensitive plant species.
		Livestock must be excluded from a restoration/revegetation site.
		Assurance that livestock grazing standards and guidelines and Fundamentals of Rangeland Health are complied with, and that livestock grazing is excluded from riparian areas as needed.
KSL-0035	Robert A. Greene	Grazing use should be reassessed as a business not a special interest political group.
KSL-0036	Mark Fruechte	I would like to see the BLM get more long term tangible commitments from ranching and developers.
KSL-0037	Phillip Krall	Crucial winter range areas should be fenced in to keep livestock out.
		We are exceeding the carrying capacity of grazing allotments year in and year out.
KSL-0038	Michael D. Kohout	BLM properties are being severely overgrazed.
KSL-0040	Dean Taylor	Over grazing of land is occurring. Limit ranching, OHV use, and oil and gas leasing.

Livestock Grazing Comment Summary (continued)

Letter #	Author	Comment
KSL-0041	Unknown	The multiple use concept is being abused to the utmost by certain groups. Public lands, such as the Jowah Field, up by Pinedale have become overrun by industry and now have become so polluted that considerations are underway to close this land to the public.
KSL-0042	Samuel O. Bennion	BLM should be responsible for the replacement pasture.
		Livestock pictures need to be used in BLM posters, not just wildlife.
KSL-0044	Kelly Hoffman	Livestock grazing is a good range management tool when used right and should be continued.
		There is a lot of private land intermixed with the federal lands around this part of the state and hunters recreationalists and everyone else benefits by the access they have on and through these private lands that they might not otherwise enjoy.
KSL-0045	William R. Taliaferro	Grazing has been and continues to be a large user of the area's vegetative resources despite the efforts of some to eliminate this use.
KSL-0047	Nathan G. Maxon	Grazing reductions should be implemented in critical winter range.
		The majority of the range is overgrazed. AUM reductions needed especially in drought years and where the permittee violates the terms of the lease. The price per AUM should also be raised to reflect its real market value.
KSL-0048	Wayne Burkhardt	The RMP should encourage the development of coordinated and cooperatively developed grazing management plans. The RMP should provide for the construction and maintenance of management facilities necessary for the proper management of livestock (pasture fences water developments, vegetative treatments, etc.). The RMP should recognize livestock grazing as having economic significance to local communities.
KSL-0050	Facilitated Notes	Wildlife numbers must be managed to responsibly manage the range.
		Private AUMs exchange of use; use & control. Compensation for private AUMs not used due to restrictions (e.g. drought removes grazing early).
		Manage AUMs – grazing/livestock, but not wildlife numbers
KSL-0052	Facilitated Notes	Wheat Creek Meadows – How will resources be managed to improve conditions? Public access for wildlife observation, while still protecting habitat; Many swales/ruts of Sublette cutoff and Dempsey-Hockaday Trail are within area and should be protected and interpreted; Improve livestock control and season of grazing use.
		Range allotment management – during drought when livestock not allowed to graze, monitor after precipitation to determine if part of season could be grazed.

Livestock Grazing Comment Summary (continued)

Letter #	Author	Comment
KSL-0052 (continued)	Facilitated Notes	Limit livestock grazing on narrow strip between private land along Lincoln County #306 Road.
KSL-0054	Edward M. Bown, Diamond W Ranch Co., Inc., Rees Land & Livestock Co., JW Ranching Co., Inc., K-Ron Ranch, LLC	The RMP should encourage the development of coordinated and cooperatively developed grazing management plans.
		The RMP should provide for the construction and maintenance of management facilities necessary for the proper management of livestock grazing (pasture fences, water developments, vegetative treatments, etc.).
		The RMP should recognize livestock grazing as having economic significance and other benefits to local communities.

Mineral Resources Comment Summary

Letter #	Author	Comment
KSL-0001	Bjork, Lindley, Little, PC	Incorporate the Energy Policy and Conservation Act inventory results into the plan decision.
		Provide realistic opportunities for the development of oil and natural gas on federal lands with only necessary restrictions on surface use.
		Recommend that the RFD scenario analyze sufficient potential development.
KSL-0005	Anadarko Petroleum Corp.	Ensure oil and gas resources are represented equally.
		Rely on historic figures for determining average acreage disturbance per well location or mile of linear feet.
		Examine management options that would protect or enhance opportunities to explore for and develop oil and gas resources.
		Application of reasonable mitigation measures (least restrictive that is necessary) designed to limit or avoid demonstrated impacts to surface resources access.
		Allowance for application of new information, technology or economic conditions on lands with unknown, low and moderate oil and gas potential.
		Effects on opportunities to lease explore and develop oil and gas resources resulting from restrictive surface management decisions.
		Limiting stipulations that remain in effect after application of standard lease terms and conditions.
		The effect of surface resource management decisions on future subsurface development opportunities and activities.
		Reduced access to public lands for purposes of exploring for and producing oil and gas resources should be considered a separate issue from economic impacts.
		Address socio-economic benefits of oil and gas development activities identifying the cost of administering the mineral program and industry's financial contributions to Wyoming schools, local, state and federal treasuries.
BLM must not make assumptions that industry can directional drill in any situation.		

Mineral Resources Comment Summary (continued)

Letter #	Author	Comment
KSL-0005 (continued)	Anadarko Petroleum Corp.	Consideration of directional drilling as a mitigation tool is inappropriate for planning level analyses.
		The revised RMP must include a program to monitor the effectiveness of stipulations and conditions of approval.
		Specify in the RMP if and how valid existing lease rights could be impacted by the new leasing decisions.
		It is important to recognize that oil and gas exploration and development activities are fully compatible with semi-primitive recreational values and multiple use.
		BLM should strongly promote geophysical activities throughout the planning area.
		Ensure that all possible methods for handling coalbed methane produced water are addressed.
KSL-0006	Defenders of Wildlife, The Wilderness Society, Wyoming Outdoor Council, Wyoming Wilderness Association, Upper Green River Valley Coalition, American Lands Alliance	Identify the purpose and need with specific attention to oil and gas related activities.
		BLM should determine what the desired outcome(s) from oil and gas leasing, exploration, and development activities are, particularly with reference to the desired outcome(s) for endangered species protection, migratory wildlife, non-migratory wildlife, prevention of habitat fragmentation, protecting the naturalness of landscapes and their aesthetic appeal, the prevention of unnecessary or undue degradation of public lands, the prevention of air and water pollution, and the protection of surface owner rights on slit-estate lands.
		Mechanisms for resolving conflicts between the desired outcomes for oil and gas development relative to other resources should be identified in the EIS and adopted in the RMP. The requirement for BLM to prevent unnecessary or undue degradation of the public lands should be paramount in such balancing.
		In the context of oil and gas development, we specifically recommend that BLM reject the position that because regulations provide that an oil and gas lease conveys the right to “use so much of the leased lands as is necessary to explore for, drill for . . . and dispose of all of the leased resource. . .” essentially anything an oil and gas lessee proposes to do to develop a lease is “necessary” or “due” and therefore any resulting degradation of the public lands is not “unnecessary” or “undue.” <i>See</i> 43 CFR § 3101.1-2 (but also providing for substantial retained discretion in BLM to regulate oil and gas development despite issuance of the lease). Instead, we urge BLM to require, in a direct and positive fashion, that oil and gas development not cause unnecessary or undue degradation, and to ensure that this is the case.

Mineral Resources Comment Summary (continued)

Letter #	Author	Comment
KSL-0006 (continued)	Defenders of Wildlife, The Wilderness Society, Wyoming Outdoor Council, Wyoming Wilderness Association, Upper Green River Valley Coalition, American Lands Alliance	Alternatives developed for consideration in the EIS needs to include a wide range of options relative to allocating lands in this area to oil and gas extraction activities. Moreover, FLPMA provides that areas where less than all resource uses are allowed should be “large enough to provide sufficient latitude for periodic adjustments” to accommodate changing circumstances. 43 USC §1702I.
		In the context of oil and gas leasing, “incremental step” consultation is of particular concern, and the EIS must address this issue. The decision in <i>Conner v. Burford</i> , 848 F.2d 1441 (9 th Cir. 1988) should control all consultation in the context of oil and gas development.
		Highlight that oil and gas leasing, exploration, and development cannot occur without BLM first: (1) conducting an in depth analysis of cumulative impacts of the development; (2) fully disclosing these impacts to the public; and (3) avoiding – or fully mitigating- these impacts to protect other resources in the Valley.
		Place a moratorium on leasing during the RMP revision process.
		Withdraw environmentally sensitive areas from oil and gas leasing.
		Place non-surface occupancy stipulations on all future leases issued.
		Disclose why lease rights have not expired.
		Prohibit leasing when the RFD has been exceeded.
		Guide and regulate the configuration of timing of lease offerings.
		Monitor and enforce lease acreage limits.
		Require that the BLM to thoroughly examine the impacts set forth in, <i>Guidance on Adequately Evaluating the Impacts of Site Specific Seismic Exploration Projects</i> , before approving any further seismic activities in the Upper Green River Valley.
		The RMP should include a provision requiring that if there is an immediate threat to public health, safety, or welfare or the environment, BLM will notify the operator(s) and immediately order that all wells causing these problems be shut-in pending further investigation.
		Additionally, the RMP EIS should provide that all reports of methane migration to any residence, building or near human activity will result in the automatic shutting in of all coalbed methane wells within a 3 mile radius. Based upon a thorough investigation, if the threat cannot be remedied by mitigation, the BLM should require that all offending well(s) be plugged, reclaimed and monitored. If mitigation can remedy the threat, the BLM should require that the shut-in order remain in effect until mitigation and monitoring measures are adopted and implemented, after full notice and hearing.

Mineral Resources Comment Summary (continued)

Letter #	Author	Comment
KSL-0006 (continued)	Defenders of Wildlife, The Wilderness Society, Wyoming Outdoor Council, Wyoming Wilderness Association, Upper Green River Valley Coalition, American Lands Alliance	The BLM must adopt a RFD scenario that balances energy development with the protection of other valuable natural resources. If the BLM fails to do so, the Valley could be turned into a single continuous gas field in violation of FLPMA’s multiple-use mandate and a number of other federal environmental laws.
		Reclamation efforts throughout the Kemmerer Resource Area, including details regarding the total acres disturbed since the last RMP, the acreage successfully reclaimed, the definition of “successful reclamation,” and the acres where reclamation was attempted but failed.
		Predictions regarding the length of time the BLM expects that the current oil and gas projects will be operating.
		Considering this impacts analysis, the BLM must develop a range of RFD scenarios that address both the acreage allowed to be developed and the number of wells to be drilled within this acreage. The public must understand the amount of acreage slated for development because of the impacts to open space and wildlife. The public must understand the number of wells the BLM seeks to permit because of the impacts to air and water quality for the surrounding communities, downstream users, and citizens from across the country that visit the Greater Yellowstone Ecosystem.
		Any RFD Scenario development must also be based on baseline data and ongoing monitoring. Accordingly, in this section of the RMP EIS the BLM must set forth the following: Socio-economic studies examining issues such as the impacts of an energy boom on community resources, wildlife, etc.; Any other applicable studies that examine or information related to the impacts of oil and gas development on other natural resource values.
		The BLM must revisit its assumptions and evaluate whether the assumptions regarding surface disturbance from well-pad construction, road-building, pipeline infrastructure, construction of compressor stations, etcetera are correct. This analysis must be completed for each oil and gas project within the resource and should also consider projects on adjacent lands. A table with accompanying text would best convey this information to the public.
		The BLM must ensure that it while developing oil and gas resource it prevents the unnecessary and undue degradation of the lands and avoids of impacts of oil and gas development where technologically feasible, and especially in cases where avoiding impacts is practical.
		The RMP must, in great detail, address coalbed methane issues and impacts and adopt specific provisions to avoid – or fully mitigate – such impacts on other valuable natural resources.

Mineral Resources Comment Summary (continued)

Letter #	Author	Comment
KSL-0006 (continued)	Defenders of Wildlife, The Wilderness Society, Wyoming Outdoor Council, Wyoming Wilderness Association, Upper Green River Valley Coalition, American Lands Alliance	R.S. 2477 claims should not be processed until the DOI can clarify the relationship of the recent “Disclaimer of Interest Rule” to R.S. 2477 claims.
		The RMP EIS must address issues related to noise, and its impact on the remoteness and quietness that so many seek on the public lands. In particular, the RMP provide requirements to minimize the noise created by oil and gas development activities especially the noise problems from compressors and compressor stations. Noise occurring due to oil and gas exploration and well drilling should also be minimized.
KSL-0008	Office of State Lands and Investments	Consider state land development of subsurface resources.
KSL-0009	WGFD	The RMP should address the foreseeable level of coalbed methane development and the probable impacts on fisheries and aquatic habitats. This should include habitat fragmentation, associated roadway impacts (such as erosion resulting in sedimentation to both ephemeral and perennial waterways) and other cumulative impacts associated with mineral, oil or gas extraction. The RMP should also address mitigation approaches to minimize these impacts.
KSL-0011	State of Wyoming, Office of the Governor	The BLM be sensitive to maintaining access to State trust lands isolated by lands under BLM’s jurisdiction, address the economic values of the mineral estate potential for the area, only revise those parts of the existing RMP which are “not working,” and maximize a balanced approach to the use of the area’s resources, minimizing regulation as much as possible. Continuous monitoring of impacts an mitigation effectiveness, and flexibility to manage adaptively, will be key issues.
KSL-0012	Biodiversity Conservation Alliance	The Kemmerer RMP revision should mandate directional drilling to reduce wildlife habitat impacts.
		The Kemmerer RMP revision should prohibit surface disposal of coalbed methane wastewater.
		The Kemmerer RMP revision should mandate the use of pitless drilling technology.
KSL-0021	Edward M. Bown	The RMP should provide mineral production on public land while assuring appropriate rehabilitation/re-vegetation on all disturbed sites (wells, access roads, pipelines).

Mineral Resources Comment Summary (continued)

Letter #	Author	Comment
KSL-0024	ChevronTexaco	Surface management programs that are selected should protect and encourage opportunities to explore for and produce oil and gas.
		In selecting surface management options, the BLM should recognize that directional drilling may not be a viable option for much of the drilling in the RMP area, particularly the Overthrust area because of the steep angle of the various producing formations.
		Because an industry has not current exploration interest in an area should not be considered a reason for closing an area to future exploration and production. In addition, the BLM needs to recognize that the economics for an exploration prospect can change relatively quickly as technology changes and advances, and for this reason it is almost impossible for industry to forecast the number of wells that will be drilled in the next 20 years, as set out in Section 2.8.1.2 of the Summary of the MSA.
		The BLM should consider using a system that establishes an acceptable area of surface disturbance that will be permitted for oil and gas development, rather than trying to establish a specific number of wells that will be permitted.
KSL-0025	City of Kemmerer	In regard to economic development and job creation, the City of Kemmerer supports increased mineral and gas extraction.
		The City of Kemmerer has a major need for gravel resources. Purchasing gravel and fill material from private suppliers is cost prohibitive for our city with its limited funding sources. To maintain and improve our streets and other infrastructure, we need to be able to obtain materials at a more reasonable cost.
KSL-0028	Sweetwater County Conservation District	Mineral production should be provided on public land. Appropriate rehabilitation/re-vegetation on disturbed site should address prevention and treatment of noxious and invasive weeds on these sites.
KSL-0029	W & M Thomas Ranches, LLC	The RMP should provide mineral production on public land while assuring appropriate rehabilitation/re-vegetation on all disturbed sites (wells, access roads, pipelines). It should address prevention and treatment of noxious and invasive weeds on these disturbed sites as well.
KSL-0030	William G. Fischer	Follow guidelines developed to minimize the possibility of a world class mining disaster in the Kemmerer RMP area.
		Put directional drilling technology to use.
		Address worker safety in a serious “Multiple Mineral Development” environment involving workers in the underground trona mines, possibly those in underground coal mines, and maybe even some rig workers on the surface.
		Centralize the surface casing through the water and trona-bearing zones along with the placement of cement or other fillers that may be used to minimize the potential damage caused by lateral displacements.

Mineral Resources Comment Summary (continued)

Letter #	Author	Comment
KSL-0030 (continued)	William G. Fischer	Verify the integrity of surface casing cement and the centralization of casings through the trona and water bearing horizons.
		Periodically check the fingerprint chemical composition of gas in the mines.
		The RMP should address the closure of the large number of hazardous abandoned mine openings in the planning area.
		Assure public access to well completion data.
KSL-0031	Matthew W. Krall	Sacrificing the resource area to oil, gas and coalbed methane development would exclude the importance of other management issues and the effective management of their values.
		As a suggestion for future revisions to the RMP I would strongly recommend that all of the resource management area from Kemmerer, north and east of Hwy. 30 and north and west of Hwy. 189 be permanently closed to oil, gas, and methane activities and continuing in such a fashion into the Pinedale resource management area.
		To lessen the effects of habitat fragmentation, visual resources, loss of public domain, and their interrelationships to each other and other management issues, use the nine-point directional drilling techniques, consolidation of apparatuses and hardware, underground cauldrons to lessen visual deterioration, consolidation of road networks, and immediate reclamation of areas of surface disturbances.
KSL-0032	EOG Resources	[MSA] A baseline in terms of active wells in the management area is not provided.
		[MSA] Table 2: Oil and Gas Well Data is unclear. Of the wells listed in the table, is the reader to conclude that of the 1,440 wells completed, 1,024 of these wells are P&A, and 4 are inactive or are considered monitoring wells. Do the remaining 368 wells represent the number of active wells in the management area?
		[MSA] Descriptive text referring to “intensive exploration” should be quantified.
		[MSA] Although produced water disposal may be of concern to the BLM, it is incumbent upon the BLM to address its concern with the appropriate management agency, the State.
		[MSA] Operators should be allowed to cooperatively develop the RFD scenario with the BLM and should be able to review the RFD scenario after it is developed in order to ensure document accuracy.
		[MSA] EOG urges that the BLM allow sufficient time be allowed to conduct a thorough review of the data supplied to the BLM by management area operators for incorporation into the document analysis.
		[MSA] The RFD scenario should include specific details of current and projected take-away pipeline capacity from the management area.

Mineral Resources Comment Summary (continued)

Letter #	Author	Comment
KSL-0032 (continued)	EOG Resources	[MSA] The need for an increase in trunk line capacity should be related to economic projects and energy needs for the management area and the nation.
		[MSA] The BLM should discuss the surface disturbance associated with trunk line installation with management area pipeline companies.
		[MSA] The RFD scenario must include a discussion of well life in the management area and should attempt to relate the number of wells drilled prior to the implementation of the RMP to the number that would be abandoned during the planning period.
		[MSA] If there are well pads in the management area that have been reclaimed but have yet to be inspected and released from bonding requirements by the BLM, they should be excluded from the amount of disturbed lands in the management area.
		[MSA] The RFD scenario and EIS should include an estimate of the compression needs required for future production. The documents should include a discussion of the amount of existing compression.
		[MSA] Estimates of the number and types/horse power of compressors currently in use and projected for future production needs should be determined through discussions with management area operators and pipeline/gas transmission companies.
		[MSA] The BLM should account for a level of CBNG development within the RMP and EIS that may result from fluctuating market influences and increased market demand.
		[MSA] EOG is convinced that future gas prices will support continued production throughout the time frame of the RMP. The RFD scenario and EIS should utilize this assumption in its development scenario.
		[MSA] The RFD scenario and EIS should consider possible changes in spacing that may occur during the next 20 years and incorporate such possibilities into its projections.
		Potential takings should be limited by the careful development of alternatives that recognize that the methodology used by operators to develop the leased mineral resources cannot be mandated.
		The use of alternative drilling technologies should not be presumed to be feasible on anything but a well-specific basis.
		The EIS alternatives should include an alternative that allows mineral resource extraction by operators in the district to occur with the employment of reasonable and best management practices (BMPs).
		The EIS should not include “staged leasing” in its alternatives.
		The BLM should avoid singling out oil and gas development as the sole source of surface disturbance and habitat destruction.
The validity of the RMP should not be limited to a predetermined number of wells or level of development.		

Mineral Resources Comment Summary (continued)

Letter #	Author	Comment
KSL-0032 (continued)	EOG Resources	The EIS must consider and should include data resulting from studies that demonstrate the beneficial effects of oil and gas development.
		A Statement of Adverse Energy Impacts should be developed for each alternative and should discuss the following topics: the impact of timing restrictions; the impact of designated areas excluded from energy development; costs to oil and gas development associated with the mandate of alternative drilling technologies, such as directional drilling; and costs to consumers if energy development is hindered or delayed as supplies fall short of demand.
KSL-0033	The Pittsburg & Midway Coal Mining Co.	The WDEQ/LQD permits mineral activity through consultation and approval with the WGFD, BLM, USFWS, yet we find increased and conflicting regulatory burdens being placed by the BLM for wildlife concerns on the same activities after the fact.
		Coal mining regulations under the jurisdiction of WDEQ/LQD account for mining activities within the boundaries of areas designated as crucial habitat and should be allowed to be enforced as such.
		There should not be a duplicity of regulations to conduct mining activities. The BLM should be participating in the permit process through the WDEQ/LQD.
		Areas of moss rock gathering leave voids in cover and production when the rocks are harvested. To discourage the increase in weeds on BLM lands it would be advantageous to seed areas of rock removal.
		Federal land in an active mining permit should be designated as closed to recreation and OHV use.
KSL-0034	National Wildlife Federation, Greater Yellowstone Coalition, Defenders of Wildlife, The Wilderness Society, Wyoming Outdoor Council	BLM should give specific attention to the purposes and needs for oil and gas related activities that will be analyzed in the EIS. BLM should address in detail what the purpose of future leasing, potential exploration, and development activities would be. These considerations should be made with explicit recognition of the relative value of the RMP area for meeting local, regional, and national energy needs and what alternatives exist for meeting those needs locally, regionally and nationally.
		Alternative forms of energy such as wind power must be considered when determining the purpose and need for oil and gas development along with the relative contributions of alternatives and fossil fuels to climate change. The relative value of the area for meeting energy needs versus supplying environmental amenities/needs should be considered in identifying the purpose(s) and need(s) of oil and gas development. Similarly, identification of where specifically oil and gas leasing, exploration, and development is appropriate and inappropriate in the RMP area, and why, should be addressed in the EIS as part of the definition of the purpose and need for the RMP.

Mineral Resources Comment Summary (continued)

Letter #	Author	Comment
KSL-0034 (continued)	National Wildlife Federation, Greater Yellowstone Coalition, Defenders of Wildlife, The Wilderness Society, Wyoming Outdoor Council	Mechanisms for resolving conflicts between the desired outcomes for oil and gas development relative to other resources should be identified in the EIS and adopted in the RMP.
		BLM require, in a direct and positive fashion, that oil and gas development not cause unnecessary or undue degradation, and to ensure that this is the case.
		Wherever an ACEC is designated, BLM should consider withdrawing the areas from operation of the mining and mineral leasing laws pursuant to 43 USC § 1714 so as to ensure there is no irreparable damage.
		Energy development is a potentially harmful activity that must be addressed in the EIS and regulated by the RMP.
		The EIS should make similar analyses relative to these minerals. Additionally, many of the recommendations in this section are in conformance with the report “Land Use Planning and Oil and Gas Leasing on Onshore Federal Lands. We request that BLM consider and respond to this report as it develops the RMP.
		While the split-estate issue in the Kemmerer Resource Area is smaller than that in some BLM Resource areas in Wyoming, this is still an issue a major concern because private landowners who live on “split estates” are often severely affected by BLM’s oil and gas leasing decisions.
		If the BLM fails to withdraw private surface lands from oil and gas leasing, the RMP should include a discussion of and adopt landowner protections provisions that condition development to protect private surface owners who could be adversely affected by oil and gas development.
		While developing the <i>draft</i> RMP EIS, the BLM should review and make full use of the provisions in the Surface Mining Control and Reclamation Act, 30 United States Code (USC) §§ 1221 to 1230a, that apply to protect surface owners with federal minerals estates underneath their land.
		Rights-of-way are often part-and-parcel of energy development projects, as well as many other activities. All provisions in the Mineral Leasing Act and FLPMA must be adhered to relative to rights-of-way to help ensure environmental protection.
		We believe the revised RMP should prohibit future oil or gas leasing prior to completion of an EIS that analyzes the site-specific impacts of proposed leasing.
The RMP should specify that all leases should be issued with a NSO stipulation on the entire lease pending completion of a site-specific EIS to determine if surface occupancy can be allowed.		

Mineral Resources Comment Summary (continued)

Letter #	Author	Comment
KSL-0034 (continued)	National Wildlife Federation, Greater Yellowstone Coalition, Defenders of Wildlife, The Wilderness Society, Wyoming Outdoor Council	The RMP should explicitly prohibit oil and gas leasing whenever the RFD scenario has been exceeded, especially if this development is occurring due to new technological innovations that have not been subject to adequate environmental review. Leasing should not proceed until updated environmental analyses are completed.
		BLM must minimize conflicts between surface owners and companies developing subsurface minerals by proactively seeking and addressing their concerns in the design and review of projects, including leasing itself.
		BLM should use its general authority to condition development and to protect private surface owners who could be adversely affected by oil and gas development.
		The BLM must objectively analyze any purported “limits” on oil and gas development in the RMP process, and continue regulating this activity as required by law. The BLM should focus analysis of the purported “adverse effects” of lease stipulations on energy supplies on realistic estimates of economically recoverable resources, not just “technically recoverable” resources.
		The BLM should use well-supported high and low range estimates of gas and oil prices in any analysis of the amounts of oil and gas affected by stipulations.
		The RMP should adopt specific definitions of what constitutes “due care and diligence,” “undue damage to surface or subsurface resources” and what specifically must be achieved to “reclaim the disturbed surface. . . .” At a minimum, the requirements of Onshore Oil and Gas Order No. 1, especially relative to reclamation plans, must be strictly complied with, and the EIS should analyze whether wells reclaimed in the past pursuant to these requirements have actually been effectively reclaimed.
		BLM should fully utilize well spacing densities that are appropriate for protecting other resource values in an area, as required pursuant to 43 USC § 1732(b) and other law.
		The RMP must ensure that the unique impacts of coalbed methane development are evaluated prior to leasing, and that such analyses do not simply duplicate the analyses done for conventional gas fields.
		The use of hydraulic fracturing and the impacts of drilling fluids (muds) and chemicals must be considered in the EIS.
		We specifically recommend that, if “fracking” is contemplated, the option of requiring water only – i.e., prohibiting the use of toxic chemicals be considered.
The RMP should provide specific guidance regarding the requirements oil and gas companies must abide by to meet the requirements of these laws, and provide for complete and thorough compliance, monitoring, and enforcement by BLM. Spill prevention and cleanup requirements must be specified.		

Mineral Resources Comment Summary (continued)

Letter #	Author	Comment
KSL-0034 (continued)	National Wildlife Federation, Greater Yellowstone Coalition, Defenders of Wildlife, The Wilderness Society, Wyoming Outdoor Council	BLM should ensure that oil and gas drilling operations (including well pads) comply with any applicable stormwater discharge requirements, including acquiring NPDES permits, as required.
		BLM should work with the USEPA relative to regulation of hazardous and toxic wastes generated from oil and gas development activities.
		The RMP should make provisions for ensuring that, in cooperation with the USEPA, the rate of inspections (and as necessary, enforcement) is increased.
		The EIS should include a realistic assessment and analysis of oil and gas well plugging, abandonment, reclamation, and enforcement needs and problems.
		The RMP should ensure that reclamation standards are enforced and increase bonds to cover actual reclamation costs.
		The RMP should increase bonds as needed to ensure the full costs of reclamation are met and should not rely on per lease bonds or on statewide bonds.
		The RMP must ensure full compliance with the Mineral Leasing Act and Surface Mining Control and Reclamation Act (SMCRA) for any coal development in the RMP area.
		Address any potential new coal mining or expansion of coal mining that might occur.
		BLM should ensure that existing suitability determinations are as up-to-date as possible and in conformance with the RMP.
		The RMP provide requirements to minimize the noise created by oil and gas development activities.
		The RMP must not permit communication sites, oil and gas drilling pads, utility rights-of-way, and road rights-of-way in known areas with special status species populations.
		Take into account the cost of the recovery of the mineral and the costs associated with compliance with all State and Federal laws and regulatory requirements.
		The BLM should consider withdrawal of special places from mineral entry.
		Areas not currently being developed for oil and gas production should be classified as at least visual resource management (VRM) II, in order to “retain the existing character of the landscape.”
		Address the impacts of oil and gas exploration and development activities on cultural resources.
We request that BLM consider addressing reasonably foreseeable development scenarios in a broader context than just oil and gas development.		
BLM should address the viability of recovering oil and gas from existing – proven – fields as opposed to creating new fields where the oil and gas potential is less known.		

Mineral Resources Comment Summary (continued)

Letter #	Author	Comment
KSL-0034 (continued)	National Wildlife Federation, Greater Yellowstone Coalition, Defenders of Wildlife, The Wilderness Society, Wyoming Outdoor Council	Address the economics – as well as the technical feasibility – of requiring oil and gas companies to utilize directional drilling and other techniques that reduce the “footprint” of oil and gas development activities.
		In the context of oil and gas leasing, “incremental step” consultation is of particular concern, and the EIS must address this issue.
		The EIS should consider whether other types of stipulations are needed (including NSO), and also whether stipulations and protections are required for ongoing operations so as to effectively protect wildlife.
		A prohibition on oil and gas leasing and development in riparian areas, or a requirement for NSO stipulations.
		Coalbed methane development can lower water tables, which have widespread implications and therefore must be addressed in the EIS. If produced waters are not re-injected, potential effects on agriculture must be considered. Dewatering coalbeds can increase the likelihood of difficult-to-control fires. Seepage of methane and its effects on vegetation, water (including domestic water and aquifers), and even the safety of people’s homes must be considered.
		Roadless areas, ACECs, unique wildlife habitats, and other special management areas should not be deemed suitable for coal mining.
KSL-0035	Robert A. Greene	Identify and assist the City of Kemmerer in permitting suitable gravel sites.
KSL-0039	Solvay Minerals	The protection of underground miners and the protection of the trona resources are of utmost importance. Development of deep gas is risky while development of shallow gas in the mechanically mineable trona area may be possible with appropriate drilling rules.
KSL-0040	Dean Taylor	Limit ranching, OHV use, and oil and gas leasing.
KSL-0041	Unknown	Reclamation of fossil mining and other mining usages need stricter enforcement.
KSL-0042	Samuel O. Bennion	More oil and gas development be encouraged on BLM lands.
KSL-0045	William R. Taliaferro	The area has massive amounts of resources but some people within the Bureau have done their best to stall and impede mineral development.
KSL-0046	Scott G. Britton	The emerging conflict between mining trona and drilling gas wells needs to be considered and clearly addressed in the RMP. The safety of the underground miners is the single most important factor to consider in addressing this issue.
		The RMP should consider the relative importance of predictable sustainable and stable growth in the soda ash industry. To this end the RMP should reflect choices that support long term growth of the soda ash industry.

Mineral Resources Comment Summary (continued)

Letter #	Author	Comment
KSL-0047	Nathan G. Maxon	The areas delineated by the WGFD as critical deer and antelope winter range should be respected. But well should be spaced at low densities such as 80 acres per well pad if drilling is going to occur in the summer.
KSL-0048	Wayne Burkhardt	The RMP should provide mineral production on public land while assuring appropriate rehabilitation/re-vegetation on all disturbed sites (wells access roads, pipelines, etc.). It should address prevention and treatment of noxious and invasive weeds on these disturbed sites as well.
KSL-0052	Facilitated Notes	More gas; less BLM.
KSL-0053	Bjork, Lindley, Little, PC	Provide realistic opportunities for the development of oil and natural gas from federal lands with only necessary restrictions on surface use.
		Use the RFD scenario to analyze potential development.
KSL-0054	Edward M. Bown, Diamond W Ranch Co., Inc., Rees Land & Livestock Co., JW Ranching Co., Inc., K-Ron Ranch, LLC	The RMP should provide mineral production on public land while assuring appropriate rehabilitation/re-vegetation on all disturbed sites (wells, access roads, pipelines).

National Historic Trails Comment Summary

Letter #	Author	Comment
KSL-0004	Wyoming Department of State Parks and Cultural Resources, SHPO	Special attention should be given to viewshed protection of historically significant transportation corridors (e.g., trails, roads, railroads).
KSL-0005	Anadarko Petroleum Corp.	The existing RMP decisions regarding protection measures for National Historic Trails should remain in effect until such time that Wyoming Historic Trail Management Plan is completed, subject to public review, and amended into the new RMP.
KSL-0010	National Trust for Historic Preservation	Ensure adequate viewshed protection (e.g., buffer zone) for the Oregon/Mormon National Historic Trail within the RMP area.
		Conduct a Section 106 review before designating any areas in and around National Historic Trails as open for activities that may allow surface occupancy.
		Attach cultural resource restrictions and stipulations for areas open for oil and gas development outside of the buffer zone protection area.
		Restrict activities by applying NSO restrictions or other enforceable stipulations adequate to prevent all impacts to the historic viewsheds of National Historic Trail.

National Historic Trails Comment Summary (continued)

Letter #	Author	Comment
KSL-0022	Fern and Fred Linton	Oil and gas development – need a clear definition of viewshed in regards to Historic Trail.
		Historic Trails – more trail markers, more analysis of elusive segments. More analysis and public information on energy development impact to trails.
		There should be plans for future development for public areas.
KSL-0024	ChevronTexaco	Encourage the BLM to retain the current Controlled Surface Use Stipulation of ¼ mile or line of sight (whichever is less) on either side of National Historic Trails. Such Stipulations should be applied only to those trails that exist “on the ground,” and not to generalized areas in which trails are thought to have been located but for which there is not evidence.
KSL-0025	City of Kemmerer	The City of Kemmerer supports partnerships with BLM to provide appropriate public access for recreational uses (i.e. hiking, biking, backway trails).
KSL-0032	EOG Resources	[MSA] Access restriction associated with the preservation of significant resource values associated with National Historic Trails should not preclude an operator’s right to develop its leases.
		[MSA] Evaluating the historic setting and landscape for National Historic Trails does not necessarily require a decision that insists upon preservation of visual characteristics identical to those that existed during the times when the trails were actually in use.
		[MSA] Inspection of Figure 2 in the MSA summary shows that all of the National Historic Trails cross or parallel major roads or highways and many travel through or adjacent to towns and cities. To insist that oil and gas development remain hidden from viewpoints along these trails is blatantly discriminatory against the industry.
KSL-0045	William R. Taliaferro	The only significant part of this is the historic route they followed however the ruts wouldn’t be there today if it weren’t for sheep wagons truck associated with ranches sportsmen and the mineral industry using the routes. Where better routes have been built or used the old trails are gone.
KSL-0050	Facilitated Notes	Concerned about visual aspects of wind farms particularly in relation to historic trails.
KSL-0052	Facilitated Notes	Oil and gas impacts must be managed to protect them; more interpretive signs and ruts identification will help protect trails; Hawkwatch international – migration counting site on Commissary Ridge – interpret the site for the public and preserve it.

Off-Highway Vehicles Comment Summary

Letter #	Author	Comment
KSL-0002	Wyoming Department of State Parks and Cultural Resources, Division of State Parks and Historic Sites	Establish a current inventory of roads and trails for OHV use in Wyoming.
		Identify roads to be included in Wyoming OHV program.
		Address appropriate use of existing and future OHV use on public lands.
KSL-0006	Defenders of Wildlife, The Wilderness Society, Wyoming Outdoor Council, Wyoming Wilderness Association, Upper Green River Valley Coalition, American Lands Alliance	Given the recent increase in the popularity of recreation, the technological advances in mechanized and motorized “toys,” and the high growth rates in the number of visitors to public lands, it is critical that the RMP EIS address these issues.
		The RMP EIS must address issues related to noise, and its impact on the remoteness and quietness that so many seek on the public lands. OHV noise should also be addressed.
		OHV noise should be addressed.
KSL-0010	National Trust for Historic Preservation	BLM should comply with Section 106 of the NHPA prior to designating areas for OHV use.
KSL-0017	Dave Huber	It would be in the general public’s interest to close the present “access trail” to motorized traffic to prevent further damage to the southern end of the Commissary Ranch Association area.
KSL-0022	Fern and Fred Linton	(illegible) creek wetlands needs designated wildlife viewing areas so that all-terrain vehicles (ATVs) and vehicles do not randomly cross meadows etc. to access various sites.
		There should be plans for future development of OHV trails for public areas.
KSL-0027	Michael R. Jensen	We would like to see the RMP retain existing roads and trails for OHV recreation use.
		We would also like to see a designated “open” area for OHV use.
		We would like to see an additional open area for OHV use at the site of the old Lyman dump east of Lyman, which could be used for a moto-x track.
		Designating an OHV area would enable access to state funds earmarked for trail improvements.
KSL-0031	Matthew W. Krall	Road closures to protect habitat and a public education program are essential to ensure enforcement o these issues and compliance with the public sector.

Off-Highway Vehicles Comment Summary (continued)

Letter #	Author	Comment
KSL-0033	The Pittsburg & Midway Coal Mining Co.	The use of OHVs is becoming an increasingly growing concern to the resource area.
		Federal land in an active mining permit should be designated as closed to recreation and OHV use.
KSL-0034	National Wildlife Federation, Greater Yellowstone Coalition, Defenders of Wildlife, The Wilderness Society, Wyoming Outdoor Council	The RMP should designate specific trails open for OHV use.
		Trails designated as open should be clearly marked so that all users will be aware of where OHV use is, and is not, allowed (this will also assist in effective law enforcement).
		The RMP should prohibit OHV use unless routes are specifically marked and designated as available for that use (i.e., BLM should adopt a “closed unless posted open” policy).
		Even where a route is recognized, constructed, and maintained, BLM still has a responsibility to determine whether recreational OHV use is appropriate on that route.
		The RMP should implement effective, frequent monitoring of OHV impacts, and set clear benchmarks which, if exceeded, trigger closure of an area to OHVs.
		The RMP should prohibit OHV use in wilderness study areas, other areas the BLM has inventoried and found to have wilderness character, and areas within citizen-proposed wilderness areas.
		The RMP should prohibit OHV use in critical wildlife habitat, winter range, areas critical for nesting, breeding or other reproductive behaviors, and habitat for threatened, endangered or sensitive species.
		Riparian areas and wetlands are of critical importance to the biological functioning of the RMP area, and are exceedingly rare. OHVs, except on designated trails, are not appropriate in these fragile ecosystems.
		OHV use impacts must be evaluated “on all resources and uses in the planning area.”
		The RMP should prohibit unrestricted, cross-country OHV use in the RMP area.
		The RMP must insure that no cross-country vehicular (motorized and bicycle) travel is allowed in known habitat or locations of sensitive plant species.
		Specify a travel plan for OHVs that limits vehicle travel to routes that do not pass near culturally sensitive areas.
Exclusion of OHVs from riparian areas and wetlands except on designated routes.		
Development of an effective monitoring program that measures biodiversity and wildlife populations, soil erosion, vegetation health, the presence of non-native species, water quality and quantity, and the impacts of other uses such as grazing, OHVs, recreation uses, and other activities.		

Off-Highway Vehicles Comment Summary (continued)

Letter #	Author	Comment
KSL-0037	Phillip Krall	Concerned regarding ATV use off designated roads.
		Address noise from ATV use.
KSL-0038	Michael D. Kohout	Impacts from OHVs should be looked at.
KSL-0040	Dean Taylor	Limit ranching, OHV use, and oil and gas leasing.
KSL-0041	Unknown	OHVs destroy crucial habitat.
KSL-0047	Nathan G. Maxon	OHVs should be limited to roads only. No trails should be built explicitly for their use.
KSL-0048	Wayne Burkhardt	The RMP should address OHV use and abuse. Special efforts should be made to inform and educate OHV users about identifying noxious and invasive weeds preventing weed spread effects of invasives on wildlife habitat and consequences of weed infestations.
KSL-0050	Facilitated Notes	Need OHVs to control livestock off of existing trails.
		Need to control OHVs along the Green River and Fort Reserve.
KSL-0051	Facilitated Notes	SW Dirt Ryders would like an open OHV area designation.
KSL-0052	Facilitated Notes	ATV and OHV use has increased greatly in the last 5 years. Need to start to control use (Commissary Ridge Area); soils, water and wildlife affected.

Paleontology Comment Summary

Letter #	Author	Comment
KSL-0006	Defenders of Wildlife, The Wilderness Society, Wyoming Outdoor Council, Wyoming Wilderness Association, Upper Green River Valley Coalition, American Lands Alliance	BLM's multiple-use mandate requires land managers to consider the value of cultural and paleontological resources in their decision-making process. Unfortunately, these resources are frequently given short shrift in this calculus. Their value is not easily measured, and as a result they are sacrificed in pursuit of more obviously economically profitable resources. The RMP should ensure this problem is avoided.

Paleontology Comment Summary (continued)

Letter #	Author	Comment
KSL-0034	National Wildlife Federation, Greater Yellowstone Coalition, Defenders of Wildlife, The Wilderness Society, Wyoming Outdoor Council	Archeological, historical, and paleontological sites and resources should be protected through the liberal use of ACEC designations, as required by FLPMA.
		Archeological, paleontological, and historical resources must be adequately protected.
		The EIS should consider that oil and gas drilling is not appropriate in potential wilderness areas, ACECs, important wildlife habitat, and in areas with important archeological, historical, or paleontological resources due to the great relative value of the resources involved.
KSL-0045	William R. Taliaferro	Thank goodness there is private and state land in the area so these resources could be excavated sold and displayed otherwise it would remain buried.

Recreation Comment Summary

Letter #	Author	Comment
KSL-0005	Anadarko Petroleum Corp.	It is important to recognize that oil and gas exploration and development activities are fully compatible with semi-primitive recreational values and multiple use.
KSL-0006	Defenders of Wildlife, The Wilderness Society, Wyoming Outdoor Council, Wyoming Wilderness Association, Upper Green River Valley Coalition, American Lands Alliance	Recreationists desire solitude, clean air, clean water, vast undeveloped landscapes, and a place to witness healthy natural systems thriving with native plants and wildlife. The RMP should accommodate those desires.
KSL-0015	Wyoming Wilderness Association	The Wyoming Wilderness Association recommends that the RMP establish goals and objectives that consider wilderness protection equally with all other multiple uses for resource management; identify lands that are capable and available for wilderness and/or non-motorized recreation opportunities, and prohibit any uses that would diminish the remaining wilderness/roadless areas.
KSL-0027	Michael R. Jensen	Designate "open" area for OHV use.
		Open additional area for OHV use at the site of the old Lyman dump east of Lyman, which could be used for a motocross track.

Recreation Comment Summary (continued)

Letter #	Author	Comment
KSL-0033	The Pittsburg & Midway Coal Mining Co.	Federal land in an active mining permit should be designated as closed to recreation and OHV use.
KSL-0034	National Wildlife Federation, Greater Yellowstone Coalition, Defenders of Wildlife, The Wilderness Society, Wyoming Outdoor Council	The BLM should consider that rivers and streams in the RMP area are of tremendous importance to the wildlife and fish, and the beauty and recreational appeal of the area.
		The BLM must manage public lands under a “recreation opportunity spectrum.”
		All land within WSAs, BLM inventoried lands of wilderness character, proposed wilderness, and ACECs should be managed as recreation opportunity spectrum (ROS) class primitive, while other spectacular and important lands in the RMP area, such as important wildlife habitat, should be managed as ROS semi-primitive non-motorized.
KSL-0035	Robert A. Greene	BLM should pursue an active easement acquisition program to provide recreation trails.
KSL-0041	Unknown	Recreation on public lands needs to take precedence on public lands under the “multiple use concept.”
		Roads to oil/gas wells need to be minimized as to length and numbers and reclamation of those areas need to be restored for the wildlife habitat.
KSL-0044	Kelly Hoffman	The BLM needs to keep their plans and objectives in compliance with existing multiple use laws and stop closing off areas to recreational use.
		Land does not have to be shut off and/or made into wilderness to be protected.

Renewable Energy Comment Summary

Letter #	Author	Comment
KSL-0005	Anadarko Petroleum Corp.	Prepare a “Statement of Adverse Energy Impact” for each alternative analyzed.
KSL-0022	Fern and Fred Linton	More analysis and public information on energy development impact to trails.
		BLM should address wind generators.

Renewable Energy Comment Summary (continued)

Letter #	Author	Comment
KSL-0034	National Wildlife Federation, Greater Yellowstone Coalition, Defenders of Wildlife, The Wilderness Society, Wyoming Outdoor Council	Alternative forms of energy such as wind power must be considered when determining the purpose and need for oil and gas development along with the relative contributions of alternatives and fossil fuels to climate change. The relative value of the area for meeting energy needs versus supplying environmental amenities/needs should be considered in identifying the purpose(s) and need(s) of oil and gas development. Similarly, identification of where specifically oil and gas leasing, exploration, and development is appropriate and inappropriate in the RMP area, and why, should be addressed in the EIS as part of the definition of the purpose and need for the RMP.
		Address potential renewable sources of energy available from land within the RMP area.
		The potential for renewable energy sources developed elsewhere to obviate the need for fossil fuel development in the RMP area should be addressed.
		Consider ways the BLM itself can maximize the use of renewable or alternate energy sources, and increase the efficiency of energy use in all activities BLM undertakes.
KSL-0035	Robert A. Greene	Identify suitable locations for alternate energy development.
KSL-0045	William R. Taliaferro	Wind isn't consistent enough in the area to use wind generation effectively.
KSL-0047	Nathan G. Maxon	It might be wise to implement seasonal mitigation effort for windmills. The overthrust belt is a known raptor migration corridor. During the spring and fall migrations many collisions could occur. Before mills or roads are permitted be sure that our natural heritage is protected.
KSL-0050	Facilitated Notes	Concerned about visual aspects of wind farms particularly in relation to historic trails.

Social and Economic Conditions Comment Summary

Letter #	Author	Comment
KSL-0003	State of Wyoming, DEQ	Address impacts from fire (smoke, public health, etc.).
KSL-0005	Anadarko Petroleum Corp.	Reduced access to public lands for purposes of exploring for and producing oil and gas resources should be considered a separate issue from economic impacts.
		Address socio-economic benefits of oil and gas development activities identifying the cost of administering the mineral program and industry's financial contributions to Wyoming schools, local, state and federal treasuries.
		Address the costs of stipulations, mitigating measures and restrictive policies impose on industry projects, along with the economic impact to the state of Wyoming and local governments of reduced revenues.

Social and Economic Conditions Comment Summary (continued)

Letter #	Author	Comment
KSL-0005 (continued)	Anadarko Petroleum Corp.	Address impacts on employment, delays in bringing production on line, and added costs for facilities as a result of BLM management policies as a result of BLM management policies.
KSL-0006	Defenders of Wildlife, The Wilderness Society, Wyoming Outdoor Council, Wyoming Wilderness Association, Upper Green River Valley Coalition, American Lands Alliance	The RMP should include a provision requiring that if there is an immediate threat to public health, safety, or welfare or the environment, BLM will notify the operator(s) and immediately order that all wells causing these problems be shut-in pending further investigation.
		Additionally, the RMP EIS should provide that all reports of methane migration to any residence, building or near human activity will result in the automatic shutting in of all coalbed methane wells within a 3 mile radius. Based upon a thorough investigation, if the threat cannot be remedied by mitigation, the BLM should require that all offending well(s) be plugged, reclaimed and monitored. If mitigation can remedy the threat, the BLM should require that the shut-in order remain in effect until mitigation and monitoring measures are adopted and implemented, after full notice and hearing.
		Adopt an overarching prohibition on the use of insecticides, herbicides, fungicides, rodenticides, and other similar substances. Use of such substances should then only be allowed if in conformity with a site-specific written plan and fully evaluated prior to use in a NEPA document.
		Considering this impacts analysis, the BLM must develop a range of RFD scenarios that address both the acreage allowed to be developed and the number of wells to be drilled within this acreage.
		Any RFD scenario development must also be based on baseline data and ongoing monitoring. Accordingly, in this section of the RMP EIS the BLM must set forth the following: Socio-economic studies examining issues such as the impacts of an energy boom on community resources, wildlife, etc.
		The RMP should thus set forth strict inspection and enforcement guidelines inspecting the well sites quarterly, with at least one unannounced visit annually. All inspection findings will be kept in writing and made available to the public. In addition, BLM needs to back up its inspection findings with strict enforcement, including lease cancellation pursuant to 43 Code of Federal Regulations (CFR) § 3163.1(a)(5) and all civil and criminal penalties in 43 CFR Subpart 3163.

Social and Economic Conditions Comment Summary (continued)

Letter #	Author	Comment
KSL-0006 (continued)	Defenders of Wildlife, The Wilderness Society, Wyoming Outdoor Council, Wyoming Wilderness Association, Upper Green River Valley Coalition, American Lands Alliance	The BLM must revisit its assumptions and evaluate whether the assumptions regarding surface disturbance from well-pad construction, road-building, pipeline infrastructure, construction of compressor stations, etc. are correct. This analysis must be completed for each oil and gas project within the resource and should also consider projects on adjacent lands. A table with accompanying text would best convey this information to the public.
		In addition to the socio-economic analysis discussed in relation to the principles of phased development above, consideration of oil and gas development potential in the RMP area must address potential oil and gas reserves/resources from the standpoint of economically recoverable resources and not just technically recoverable resources.
		In view of the potential oil and gas boom in the Upper Green River Valley, the RMP EIS must contain a comprehensive analysis of the impact oil and gas exploration and development will have on Wyoming's clean air, clear vistas, and community health.
		The BLM must conduct a complete increment consumption analysis.
		Given the potentially severe adverse health effects associated with fine particle exposures, the EIS must fully assess the potential adverse public health effects associated with cumulative emissions of fine particles and fine particle precursors from the current and proposed sources of fine particles. In addition, the RMP EIS must identify any current or potential large increases in exposure to FP from background concentrations of 19 to 42 µg/m ³ .
		The RMP must discuss the impacts of population growth that accompanies oil and gas development on the wildlife species on the Upper Green River Valley.
		Analyze the economic impacts of livestock grazing.
KSL-0009	WGFD	The contribution of fishing and hunting, and estimates of the value of nonconsumptive wildlife uses, to the local and state economy, should be included.
KSL-0013	Wyoming Department of Agriculture	Consider the specific socioeconomic effect of all alternatives.
KSL-0019	Ken Klinker	The University of Wyoming should be consulted immediately for input on the economic analysis. No input into economic models should be made without review by the University. The model being used should be reviewed by the University to determine it is appropriate to apply to southwest Wyoming.
		Economic impact for all alternatives should be analyzed for individual counties.

Social and Economic Conditions Comment Summary (continued)

Letter #	Author	Comment
KSL-0021	Edward M. Bown	The RMP should identify the need for road and trail maintenance. This is a public safety, soil erosion and public access issue.
		The RMP should recognize livestock grazing as having economic significance and other benefits to local communities.
KSL-0024	ChevronTexaco	The BLM needs to recognize that the economics for an exploration prospect can change relatively quickly as technology changes and advances, and for this reason it is almost impossible for industry to forecast the number of wells that will be drilled in the next 20 years, as set out in Section 2.8.1.2 of the SMSA.
		The BLM should analyze and discuss the socio-economic impacts that the various surface management options it is considering will have on exploration and production.
KSL-0027	Michael R. Jensen	Designating an OHV area would enable access to state funds earmarked for trail improvements.
KSL-0028	Sweetwater County Conservation District	Road and trail maintenance should be considered as it is a public safety, soil erosion and public access issue.
		The Sonoran Institute Model for analyzing social and economic impacts must be re-evaluated - a more local approach to social and economic impacts must be incorporated (local school data, tax base data, etc.) as they relate to federal land planning in the Kemmerer RMP area relative to community stability.
KSL-0029	W & M Thomas Ranches, LLC	The RMP should identify the need for road and trail maintenance. This is a public safety, soil erosion and public access issue.
		The RMP should recognize livestock grazing as having economic significance to local communities.
KSL-0030	William G. Fischer	Follow guidelines developed to minimize the possibility of a world class mining disaster in the Kemmerer RMP area.
		Address worker safety in a serious “Multiple Mineral Development” environment involving workers in the underground trona mines, possibly those in underground coal mines, and maybe even some rig workers on the surface.
KSL-0032	EOG Resources	[MSA] The BLM must take care not to unfairly characterize the oil and gas industry as an adverse influence on human health and safety when a primary management concern is described as safety hazards associated with mining activities.
		[MSA] The MSA does not make clear that statistics that refer to “mining” also include incomes and revenues associated with oil and gas development. This deficiency should be rectified in the socioeconomic discussion in the EIS.
		The BLM should consider the importance of oil and gas development to the economy of this nation while developing its management principles.
		The description of the affected environment should include a historical perspective of land use in the management area and the how the development of oil and gas resources has facilitated economic growth.

Social and Economic Conditions Comment Summary (continued)

Letter #	Author	Comment
KSL-0032 (continued)	EOG Resources	The economic effects analysis should include beneficial impacts to the revenues generated in association with oil and gas operations in Lincoln, Uinta, and Sweetwater counties in addition to benefits to the State of Wyoming.
		The EIS should analyze impacts to public services that depend upon tax revenues generated by oil and gas operations.
		Typical or average well costs should not be used as a baseline to assess the economic viability of drilling and producing a well during the time frame of the RMP.
		The designation of Special Management Areas (SMAs), areas of limited or no surface use, or areas with seasonal restrictions to development, should be quantified in the EIS in terms of economic impacts to the oil and gas industry.
		The EIS should include provisions describing how the potential for lost revenues to oil and gas operators resulting from short and long term lease access restrictions would be recovered.
		A Statement of Adverse Energy Impacts should be developed for each alternative and should discuss the following topics: the impact of timing restrictions; the impact of designated areas excluded from energy development; costs to oil and gas development associated with the mandate of alternative drilling technologies, such as directional drilling; and costs to consumers if energy development is hindered or delayed as supplies fall short of demand.
KSL-0034	National Wildlife Federation, Greater Yellowstone Coalition, Defenders of Wildlife, The Wilderness Society, Wyoming Outdoor Council	BLM should give specific attention to the purposes and needs for oil and gas related activities that will be analyzed in the EIS. BLM should address in detail what the purpose of future leasing is. It should address what the purpose of future potential exploration and development activities would be. These considerations should be made with explicit recognition of the relative value of the RMP area for meeting local, regional, and national energy needs and what alternatives exist for meeting those needs locally, regionally and nationally.
		Consideration of oil and gas development potential in the RMP area must address potential oil and gas reserves/resources from the standpoint of economically recoverable resources and not just technically recoverable resources.
		We request that BLM consider addressing reasonably foreseeable development scenarios in a broader context than just oil and gas development.

Social and Economic Conditions Comment Summary (continued)

Letter #	Author	Comment
KSL-0034 (continued)	National Wildlife Federation, Greater Yellowstone Coalition, Defenders of Wildlife, The Wilderness Society, Wyoming Outdoor Council	Coalbed methane development can lower water tables, which have widespread implications and therefore must be addressed in the EIS. If produced waters are not re-injected, potential effects on agriculture must be considered. Dewatering coalbeds can increase the likelihood of difficult-to-control fires. Seepage of methane and its effects on vegetation, water (including domestic water and aquifers), and even the safety of people’s homes must be considered.
		A good analysis of how the different alternatives will impact the surrounding communities. For instance if trona production or natural gas production is impacted this has a direct impact on the local community. Include impacts to local schools, housing prices, local employment, and local tax revenues.
		If it weren’t for mineral production and some livestock grazing Lincoln and Uinta counties would be worse than poorest areas in Appalachia.
		The RMP should consider the relative importance of predictable sustainable and stable growth in the soda ash industry. To this end the RMP should reflect choices that support long term growth of the soda ash industry.
KSL-0050	Facilitated Notes	Want unauthorized dumping cleaned up in same area - Opal.
KSL-0051	Facilitated Notes	Socioeconomic effects of BLM decisions in Cumberland Allotment in Rich County, Utah.
KSL-0054	Edward M. Bown, Diamond W Ranch Co., Inc., Rees Land & Livestock Co., JW Ranching Co., Inc., K-Ron Ranch, LLC	Include impacts to the Cumberland and Uinta allotments and the people in Rich County, Utah and in Uinta and Lincoln Counties, Wyoming.
		The RMP should identify the need for road and trail maintenance. This is a public safety, soil erosion and public access issue.
		The RMP should recognize livestock grazing as having economic significance and other benefits to local communities.

Soil Comment Summary

Letter #	Author	Comment
KSL-0001	Bjork, Lindley, Little, PC	Provide realistic opportunities for the development of oil and natural gas on federal lands with only necessary restrictions on surface use.
KSL-0005	Anadarko Petroleum Corp.	Application of reasonable mitigation measures (least restrictive that is necessary) designed to limit or avoid demonstrated impacts to surface resources access.
KSL-0021	Edward M. Bown	The RMP should identify the need for road and trail maintenance. This is a public safety, soil erosion and public access issue.

Soil Comment Summary (continued)

Letter #	Author	Comment
KSL-0024	ChevronTexaco	The surface management options selected by the BLM should be the least restrictive available consistent with achieving the resource management objectives. The impact of these options should be subject to being monitored and measured to insure that they are effective.
KSL-0028	Sweetwater County Conservation District	Road and trail maintenance should be considered as it is a public safety, soil erosion and public access issue.
KSL-0029	W & M Thomas Ranches, LLC	The RMP should identify the need for road and trail maintenance. This is a public safety, soil erosion and public access issue.
KSL-0031	Matthew W. Krall	To lessen the effects of habitat fragmentation, visual resources, loss of public domain, and their interrelationships to each other and other management issues, use the nine-point directional drilling techniques, consolidation of apparatuses and hardware, underground cauldrons to lessen visual deterioration, consolidation of road networks, and immediate reclamation of areas of surface disturbances.
KSL-0034	National Wildlife Federation, Greater Yellowstone Coalition, Defenders of Wildlife, The Wilderness Society, Wyoming Outdoor Council	The condition of upland areas, including cryptobiotic crusts must be carefully monitored and protected.
		The RMP should establish guidance as to when avoidance of ground-disturbing activities is preferred and appropriate.
KSL-0054	Edward M. Bown, Diamond W Ranch Co., Inc., Rees Land & Livestock Co., JW Ranching Co., Inc., K-Ron Ranch, LLC	The RMP should identify the need for road and trail maintenance. This is a public safety, soil erosion and public access issue.

Special Designations Comment Summary

Letter #	Author	Comment
KSL-0006	Defenders of Wildlife, The Wilderness Society, Wyoming Outdoor Council, Wyoming Wilderness Association, Upper Green River Valley Coalition, American Lands Alliance	Since Congress required that designation and protection of ACECs be given priority in land use planning, is critical that all alternatives developed in the EIS do so.
		The RMP EIS must address the protection of existing WSAs and any designated wildernesses in the RMP area. The RMP should establish standards to ensure that the wilderness qualities of existing wildernesses and WSAs are not impaired or degraded.
KSL-0012	Biodiversity Conservation Alliance	The new RMP should survey for, identify, and protect lands of wilderness quality.
KSL-0015	Wyoming Wilderness Association	Concerned with wilderness and roadless area management, but any management activity that is directed from the Kemmerer office can severely impact the values for wilderness and roadless areas.
		The Citizens Proposal for Wyoming BLM lands has inventoried and found 52,769 acres of Raymond Mountain wilderness. The BLM should consider wilderness management for all these available and capable lands.
		The Wyoming Wilderness Association recommends that the RMP establish goals and objectives that consider wilderness protection equally with all other multiple uses for resource management; identify lands that are capable and available for wilderness and/or non-motorized recreation opportunities, and prohibit any uses that would diminish the remaining wilderness/roadless areas.
KSL-0019	Ken Klinker	SMAs should be kept as small as possible.
KSL-0021	Edward M. Bown	The RMP should critically analyze the cumulative effect of special land designations on future management options for land uses such as grazing, mineral production and vegetation management (prescribed burns or other cultural practices).
KSL-0024	Chevron/Texaco	The BLM should make the public aware of any other areas in which the BLM is considering using SMAs, areas of critical environmental concern, special status species option, and provide the scientific basis for its concerns.
		Any area in which SMAs, ACECs, special status species are proposed should be as small as possible consistent with the resource management objectives, and the existing rights of thirds parties within each area must be protected. In addition, any surface use restrictions should be the least restrictive possible.

Special Designations Comment Summary (continued)

Letter #	Author	Comment
KSL-0028	Sweetwater County Conservation District	Special land designations should be critically analyzed for the cumulative effects on future management options for land uses (i.e. grazing, mineral production, vegetation management such as prescribed burns or other cultural practices).
KSL-0029	W & M Thomas Ranches, LLC	The RMP should critically analyze the cumulative effect of special land designations on future management options for land uses such as grazing, mineral production and vegetation management (prescribed burns or other cultural practices).
KSL-0032	EOG Resources	The designation of SMAs, areas of limited or no surface use, or areas with seasonal restrictions to development, should be quantified in the EIS in terms of economic impacts to the oil and gas industry.
		Establishment of a SMA should not be allowed to impair existing lease rights.
		Designation of SMAs should be kept to a minimum in unleased areas.
KSL-0033	The Pittsburg & Midway Coal Mining Co.	There seems little benefit to designating any rivers as wild and scenic rivers, this only restricts private property rights.
KSL-0034	National Wildlife Federation, Greater Yellowstone Coalition, Defenders of Wildlife, The Wilderness Society, Wyoming Outdoor Council	Designation of ACECs must be given priority.
		BLM consider designating ACECs for all species that have been listed pursuant to the ESA or recognized as sensitive species by BLM.
		All riparian areas in the geographic area of the RMP be designated ACECs.
		Other areas that should be considered for ACEC designation are: big game wintering areas, migration and other ecological corridors, and areas with special breeding, feeding or sheltering value for wildlife, such as cliff areas used by raptors, prairie dog colonies, and caves. Areas of large, contiguous habitat, should also be considered for ACEC designation. Archeological, historical, and paleontological sites and resources should be protected through the liberal use of ACEC designations, as required by FLPMA.
		Wherever an ACEC is designated, BLM should consider withdrawing the areas from operation of the mining and mineral leasing laws pursuant to 43 USC § 1714 so as to ensure there is no irreparable damage.
		Where a potential ACEC has only been identified, BLM must nevertheless “take all feasible action to assure that those qualities that make the resource important are not damaged or otherwise subjected to adverse change pending an ACEC designation decision.”
		The RMP should adopt a prohibition against leasing in any Scenic or Recreational river corridors, or potential corridors, not just Wild river corridors, and failing that NSO stipulations should be required. ACECs should not be subject to leasing, or, at a minimum, should be subject to NSO stipulations.

Special Designations Comment Summary (continued)

Letter #	Author	Comment
KSL-0034 (continued)	National Wildlife Federation, Greater Yellowstone Coalition, Defenders of Wildlife, The Wilderness Society, Wyoming Outdoor Council	The EIS should consider that oil and gas drilling is not appropriate in potential wilderness areas, ACECs, important wildlife habitat, and in areas with important archeological, historical, or paleontological resources due to the great relative value of the resources involved.
		The RMP should prohibit OHV use in wilderness study areas, other areas the BLM has inventoried and found to have wilderness character, and areas within citizen-proposed wilderness areas.
		Address protection of existing WSAs and any designated wildernesses in the RMP area.
		Establish standards to ensure that the wilderness qualities of existing wildernesses and WSAs are not impaired or degraded.
		Citizen-proposed wilderness areas should receive the same considerations and protections as WSAs so long as they comply with the Wilderness Handbook requirements relative to wilderness inventory areas (WIAs).
		Consider supplemental and new information concerning WIAs that were previously considered for WSA status.
		The RMP should also provide for proper management of components of the National Landscape Conservation System.
		The BLM must comply with the National Wild and Scenic Rivers Act.
		Determine which of the eligible segments are “suitable” for designation as Wild and Scenic Rivers.
		Reconsider rivers that have previously been inventoried to determine whether they may now possess the qualities required for designation as a Wild or Scenic River.
		The BLM should consider withdrawal of special places from mineral entry.
		All land within WSAs, BLM inventoried lands of wilderness character, proposed wilderness, and ACECs should be managed as ROS class primitive, while other spectacular and important lands in the RMP area, such as important wildlife habitat, should be managed as ROS semi-primitive non-motorized.
		All riparian areas should be designated ACECs and given special management.
		It is critical that the Clean Water Action Plan and Riparian-Wetlands Initiative be fully implemented by the RMP, and that riparian areas be afforded ACEC protection.
		Designation of riparian areas and wetlands as ACECs.
Roadless areas, ACECs, unique wildlife habitats, and other special management areas should not be deemed suitable for coal mining.		
KSL-0036	Mark Fruechte	Set a policy that requires developers to develop an equal amount of land they use and set it aside as a wildlife sanctuary.
KSL-0041	Unknown	Managing public lands for special interest, rather than the full implementation of “multiple use.”

Special Designations Comment Summary (continued)

Letter #	Author	Comment
KSL-0044	Kelly Hoffman	Land does not have to be shut off and/or made into wilderness to be protected.
KSL-0054	Edward M. Bown, Diamond W Ranch Co., Inc., Rees Land & Livestock Co., JW Ranching Co., Inc., K-Ron Ranch, LLC	The RMP should critically analyze the cumulative effect of special land designations on future management options for land uses such as grazing, mineral production and vegetation management (prescribed burns or other cultural practices).
KSL-0045	William R. Taliaferro	If this can be sued to encumber some one or some industry I'm sure the environment community will try to use this.
KSL-0047	Nathan G. Maxon	Raymond Mountain should remain a WSA with all accompanying protections. There are many other areas within the district that should receive this designation. One area in particular is the Bridger Badlands with its scenic and fossil values.
KSL-0048	Wayne Burkhardt	The RMP should critically analyze the cumulative effects of special land designations on future management options for land uses such as grazing mineral production and vegetation management (prescribed burns or other cultural practices).

Special Status Species Comment Summary

Letter #	Author	Comment
KSL-0006	Defenders of Wildlife, The Wilderness Society, Wyoming Outdoor Council, Wyoming Wilderness Association, Upper Green River Valley Coalition, American Lands Alliance	BLM should determine what the desired outcome(s) from oil and gas leasing, exploration, and development activities are, particularly with reference to the desired outcome(s) for endangered species protection, migratory wildlife, non-migratory wildlife, prevention of habitat fragmentation, protecting the naturalness of landscapes and their aesthetic appeal, the prevention of unnecessary or undue degradation of public lands, the prevention of air and water pollution, and the protection of surface owner rights on slit-estate lands.
		Consider the <i>relative</i> value of the resources involved. By this legally required measure, rare, unique, and sensitive native species have a relative value far in excess of more common or easily replaced public land resources, or resources that can be provided from other lands. The same is true of many other resources, such as cultural and wilderness resources. Accordingly, the alternative plans that are developed, and particularly the preferred alternative, must give special emphasis to protecting and providing for relatively rare resources.
		Ensure compliance with the ESA.

Special Status Species Comment Summary (continued)

Letter #	Author	Comment
KSL-0006 (continued)	Defenders of Wildlife, The Wilderness Society, Wyoming Outdoor Council, Wyoming Wilderness Association, Upper Green River Valley Coalition, American Lands Alliance	Section 7 requirements can be furthered if the RMP: (1) adopts strong provisions for the protection and conservation of listed species, and (2) adopts measurable objectives for upward population trends for all listed species present or likely to be present in the RMP area. For example, the RMP should comply with and seek to implement any recovery plans and/or biological opinions applicable to listed species in the planning area.
		Additionally, there are two other areas of crucial importance relative to the Section 7 “duty to ensure” that BLM must abide by to protect threatened or endangered species. First is the need to engage in careful biological assessments (BAs) or other ESA-related analyses to determine if listed species in the RMP area are likely to be adversely affected by the RMP, or by actions carried out under the RMP.
		Additionally, BLM sometimes has totally merged BAs with accompanying EISs, making ESA compliance totally indistinguishable from National Environmental Policy Act (NEPA) compliance. This is inappropriate because the substantive requirements of the ESA (imposing mandatory duty to conserve listed species) cannot be met by totally merging them with the procedural requirements of NEPA (requiring analysis and disclosure of environmental impacts). The RMP should prohibit this approach and certainly it should not be utilized in the RMP EIS itself.
		Consultation regarding the RMP is required and should be initiated or reinitiated relative to all listed, proposed, and petitioned species and their critical habitat in the RMP area so as to ensure that the activities authorized or contemplated in the RMP do not jeopardize listed species or result in the destruction or adverse modification of critical habitat.
		Consultation should be completed and any biological opinion(s) issued by the Services adopted by BLM and made a binding part of the RMP (and activities occurring under it) prior to approval of the RMP.
		Consistent with existing laws, the BLM shall implement management plans that conserve candidate species and their habitats and shall ensure that actions authorized, funded, or carried out by the BLM do not contribute to the need for the species to become listed.

Special Status Species Comment Summary (continued)

Letter #	Author	Comment
KSL-0006 (continued)	Defenders of Wildlife, The Wilderness Society, Wyoming Outdoor Council, Wyoming Wilderness Association, Upper Green River Valley Coalition, American Lands Alliance	<p>For candidate species [and sensitive species] where lands administered by the BLM or BLM authorized actions have a significant effect on their status, [the BLM shall] manage the habitat to conserve the species by:</p> <ul style="list-style-type: none"> a. Ensuring candidate [and BLM sensitive species] are appropriately considered in land use plans (BLM 1610 Planning Manual and Handbook, Appendix C). b. Developing, cooperating with, and implementing range-wide or site-specific management plans, conservation strategies and assessments for candidate [and sensitive] species that include specific habitat and population management objectives designed for conservation, as well as management strategies necessary to meet those objectives. c. Ensuring that BLM activities affecting the habitat of candidate [and sensitive] species are carried out in a manner that is consistent with the objectives for managing those species. d. Monitoring populations and habitats of candidate [and sensitive] species to determine whether management objectives are being met.
		<p>Any RFD scenario development must also be based on baseline data and ongoing monitoring. Accordingly, in this section of the RMP EIS the BLM must set forth the following: Baseline data on wildlife including, but not limited to, the pronghorn antelope, mule deer, elk, moose, bighorn sheep, sage grouse, mountain plover, prairie dogs, black-footed ferrets, the array of raptors, and all species listed on the BLM's sensitive species list that are present within the Kemmerer Resource Area; Data from past, current and ongoing wildlife studies including, but not limited to, studies with respect to pronghorn antelope, mule deer, elk, moose, bighorn sheep, sage grouse, mountain plover, prairie dogs, black-footed ferrets, the array of raptors, and all species listed on the BLM's sensitive species list that are present within the Kemmerer RA.</p>
		<p>Recovering the white-tailed prairie dog and its habitat needs.</p>
		<p>Just days before scoping comments were due, the Committee for the High Desert, American Lands Alliance, Biodiversity Conservation Alliance, the Center for Native Ecosystems, and the Oregon Natural Deserts Association, filed a petition to list the Pygmy rabbit under the ESA. The BLM needs to incorporate the appropriate protection measures into the RMP EIS to protect this species and its habitat.</p>
		<p>The EIS should address compliance with the Bald Eagle Protection Act and Migratory Bird Treaty Act and the RMP should specify the means by which BLM will ensure compliance with these laws as well as pursue (or facilitate) enforcement of them.</p>

Special Status Species Comment Summary (continued)

Letter #	Author	Comment
KSL-0006 (continued)	Defenders of Wildlife, The Wilderness Society, Wyoming Outdoor Council, Wyoming Wilderness Association, Upper Green River Valley Coalition, American Lands Alliance	A number of other species in the Upper Green River Valley live in the Upper Green River Valley including but not limited to black-footed ferrets (a species protected under the ESA), burrowing owls, mountain plover (a candidate species under the ESA) etc. The RMP must provide a list of species in the Resource Area, must disclose monitoring, population, and habitat data in regard to each species and must adopt mitigation measures to protect each of these species from any development approved by this RMP.
KSL-0009	WGFD	<p>The WGFD has categorized the Colorado River and Bonneville cutthroat trout as Status 2 species. The Colorado cutthroat trout was petitioned for listing under the ESA in December 1999. The USFWS will begin to address the petition by October 2003.</p> <p>The RMP should address measures to maintain and expand current populations of Bonneville cutthroat trout.</p> <p>The Conservation Agreement and Strategy for Colorado River cutthroat trout in States of Colorado, Utah, and Wyoming, 2001 was signed by federal and state agencies, including the BLM. The Agreement states four goals, and we are listing the last three as they pertain to this scoping statement: 1) to maintain areas which support abundant Colorado River cutthroat trout and manage other areas to increase abundance, 2) to maintain the genetic diversity of the species, and 3) to increase the distribution of Colorado River cutthroat trout where ecologically, sociologically, and economically feasible. This agreement should be discussed and included in the RMP Revision.</p> <p>Address several native nongame fish species of concern that are found in waters within BLM lands.</p> <p>A draft Conservation and Management Plan for Three Fish Species in Arizona, Colorado, Nevada, New Mexico, Utah, and Wyoming addresses needs for roundtail chub, bluehead sucker, and flannelmouth sucker. The RMP should refer to this document in all applicable sections.</p> <p>The <i>Management consideration for native nongame fishes of Wyoming – native nongame fishes conservation assessment</i>, February 2003 provides recommendations and discussions on actions that may prevent the further decline of these species. This document should be reviewed and referenced within the RMP.</p>

Special Status Species Comment Summary (continued)

Letter #	Author	Comment
KSL-0009 (continued)	WGFD	Plans and Reports that are applicable: Conservation Agreement and Strategy for Colorado River cutthroat trout in the States of Colorado, Utah and Wyoming; Conservation and Management Plan for Three Fish Species – Roundtail chub, Bluehead sucker, Flannelmouth sucker; Management Consideration for native nongame fishes of Wyoming – Native nongame fishes conservation assessment, Feb 2003, WGFD Administrative Report.
KSL-0012	Biodiversity Conservation Alliance	The Kemmerer RMP revision should require adequate protection for sage grouse.
		The Kemmerer RMP revision should require adequate protection for prairie dogs.
		The Kemmerer RMP revision should adequately protect big game crucial ranges.
		The Kemmerer RMP revision should adequately protect raptor nesting habitat.
		The Kemmerer RMP revision should identify and protect mountain plover nesting habitat.
		The pygmy rabbit has been petitioned for listing under the ESA. The Kemmerer RMP should include a comprehensive survey of the Field Office for pygmy rabbits, and identified habitats should be protected by NSO stipulations and a moratorium on sagebrush eradication or reduction programs.
KSL-0033	The Pittsburg & Midway Coal Mining Co.	It appears that the BLM goes beyond habitat management and enters into species management when they begin to dictate distances to nests or leks, for example. The distances being imposed are those found within the BLM's own guidelines for managing sage grouse. If the BLM is managing habitat for the benefit of the species then the distances should be decreasing instead of increasing over the State plan.
		[In the MSA] The full wording of the ACEC acronym is not presented prior to being used in the wildlife section on critical winter ranges. This does not allow for those unfamiliar with the term to research the topic as being of value for consideration.

Special Status Species Comment Summary (continued)

Letter #	Author	Comment
KSL-0034	National Wildlife Federation, Greater Yellowstone Coalition, Defenders of Wildlife, The Wilderness Society, Wyoming Outdoor Council	In revising this RMP, BLM should consider, analyze, and wherever appropriate facilitate, international efforts to prevent environmental decline. These include a number of international agreements and treaties for resource protection, such as United Nations biosphere reserves, migratory bird treaties, the Convention on International Trade in Endangered Species, and international efforts related to biological diversity preservation, among others.
		BLM should determine what the desired outcome(s) from oil and gas leasing, exploration, and development activities are, particularly with reference to the desired outcome(s) for endangered species protection, prevention of habitat fragmentation, protecting the naturalness of landscapes and their aesthetic appeal, the prevention of unnecessary or undue degradation of public lands, the prevention of air and water pollution, and the protection of surface owner rights on split-estate lands.
		Measures for protecting the land to achieve desired outcomes should be developed at an appropriate scale, with a landscape or bioregional scale being the appropriate scale for many actions, particularly endangered species protection.
		BLM consider designating ACECs for all species that have been listed pursuant to the ESA or recognized as sensitive species by BLM.
		The BLM should conduct surveys to determine the location and characteristics of native plant communities and rare or special status species.
		The RMP must insure that no cross-country vehicular (motorized and bicycle) travel is allowed in known habitat or locations of sensitive plant species.
		The RMP must not allow surface disturbing activities in threatened, endangered or sensitive plant species habitat.
		The RMP must exclude areas with threatened, endangered, or sensitive plants from fuelwood cutting areas.
		BLM must review grazing allotments and address the protection of areas with threatened, endangered, or sensitive plant species.
		The RMP must not permit communication sites, oil and gas drilling pads, utility rights-of-way, and road rights-of-way in known areas with special status species populations.
		BLM must augment law enforcement personnel and field staff, and instruct them to concentrate efforts in areas with special status species habitat.
		The RMP must not allow reseeding or surface-disturbing restoration after fires in areas with special status plant species.

Special Status Species Comment Summary (continued)

Letter #	Author	Comment
KSL-0034 (continued)	National Wildlife Federation, Greater Yellowstone Coalition, Defenders of Wildlife, The Wilderness Society, Wyoming Outdoor Council	The RMP: (1) adopts strong provisions for the protection and conservation of listed species, and (2) adopts measurable objectives for upward population trends for all listed species present or likely to be present in the RMP area.
		Consultation should be completed and any biological opinion(s) issued by the Services adopted by BLM.
		In the context of oil and gas leasing, “incremental step” consultation is of particular concern, and the EIS must address this issue.
KSL-0045	William R. Taliaferro	If we allow the “native species” mentality to permeate wildlife management we’ll eventually end up with poor fisheries a few cutthroat trout and the trash fish of the past.
		Most environmental groups and some government agencies would give every species some special status especially if this would impact the legitimate efforts of the species Homo Sapien.
KSL-0047	Nathan G. Maxon	Serious efforts should be made to inventory for both Boreal Toads and Columbia Spotted frogs. We need to know where populations of these animals exist. When populations are found habitat should be protected. In these cases grazing should be eliminated near wetlands and riparian areas and reduced in upland areas that host important overwintering sites.

Transportation and Access Comment Summary

Letter #	Author	Comment
KSL-0005	Anadarko Petroleum Corp.	Reduced access to public lands for purposes of exploring for and producing oil and gas resources should be considered a separate issue from economic impacts.
KSL-0006	Defenders of Wildlife, The Wilderness Society, Wyoming Outdoor Council, Wyoming Wilderness Association, Upper Green River Valley Coalition, American Lands Alliance	Any RFD scenario development must also be based on baseline data and ongoing monitoring. Accordingly, in this section of the RMP EIS the BLM must set forth the following: Baseline data and data from past, current, and ongoing studies examining road densities and surface disturbance in the Resource Areas.

Transportation and Access Comment Summary (continued)

Letter #	Author	Comment
KSL-0008	Office of State Lands and Investments	Maintain access to lands (state and private) surrounded by BLM.
		Maintain access to state lands for mineral development.
KSL-0009	WGFD	Access to public lands is an issue, and management is easier if public lands are blocked up. The RMP should include and promote actions such as conservation easements and land exchanges to accomplish those purposes. Additionally, the RMP should consider access for anglers and hunters in realty actions.
		The RMP should address the issue of roads in the floodplain. Where streams must be crossed, best management practices should be employed to maintain stream equilibrium upstream and downstream of a crossing.
KSL-0015	Wyoming Wilderness Association	Concerned with wilderness and roadless area management, but any management activity that is directed from the Kemmerer office can severely impact the values for wilderness and roadless areas.
		The Wyoming Wilderness Association recommends that the RMP establish goals and objectives that consider wilderness protection equally with all other multiple uses for resource management; identify lands that are capable and available for wilderness and/or non-motorized recreation opportunities, and prohibit any uses that would diminish the remaining wilderness/roadless areas.
KSL-0017	Dave Huber	It would be in the general public's interest to close the present "access trail" to motorized traffic to prevent further damage to the southern end of the Commissary Ranch Association area.
KSL-0021	Edward M. Bown	The RMP should identify the need for road and trail maintenance. This is a public safety, soil erosion and public access issue.
KSL-0027	Michael R. Jensen	We need to improve the road into the hill climb site to prevent the current road from rutting and growing wider.
KSL-0028	Sweetwater County Conservation District	Road and trail maintenance should be considered as it is a public safety, soil erosion and public access issue.
KSL-0029	W & M Thomas Ranches, LLC	The RMP should identify the need for road and trail maintenance. This is a public safety, soil erosion and public access issue.
KSL-0031	Matthew W. Krall	All of the resource management area from Kemmerer, north and east of Hwy 30 and north and west of Hwy 189 be permanently closed to oil, gas, and methane activities and continuing in such a fashion into the Pinedale resource management area.

Transportation and Access Comment Summary (continued)

Letter #	Author	Comment
KSL-0034	National Wildlife Federation, Greater Yellowstone Coalition, Defenders of Wildlife, The Wilderness Society, Wyoming Outdoor Council	In general, BLM should evaluate the road system in the RMP area and determine the minimum system of routes necessary
		Prohibit road building as a means to accomplish any vegetation treatments in furtherance of the fire policy.
		The RMP must limit habitat fragmentation resulting from road building, protect current roadless areas, provide for aggressively closing unneeded or ecologically destructive roads, and provide for maintaining needed roads so as to reduce negative environmental impacts.
		The RMP should establish specific, binding limits on road densities.
KSL-0038	Michael D. Kohout	Access to and transportation OHVs should be looked at.
KSL-0040	Dean Taylor	Limit road building.
KSL-0044	Kelly Hoffman	We need the BLM to be more public friendly when it comes to access on BLM lands. The use of roads needs to be looked at objectively not always through the eyes of groups that have a lot of money to pressure the BLM into their own point of view.
		Land does not have to be shut off and/or made into wilderness to be protected.
KSL-0050	Facilitated Notes	Likes current access on existing 2-track roads and only closing them when washed out or mudholes.
		Closure of road south of Opal in vicinity of water tank – want it closed.
KSL-0054	Edward M. Bown, Diamond W Ranch Co., Inc., Rees Land & Livestock Co., JW Ranching Co., Inc., K-Ron Ranch, LLC	The RMP should identify the need for road and trail maintenance. This is a public safety, soil erosion and public access issue.

Utility and Communication Corridors Comment Summary

Letter #	Author	Comment
KSL-0034	National Wildlife Federation, Greater Yellowstone Coalition, Defenders of Wildlife, The Wilderness Society, Wyoming Outdoor Council	The issue of the impact of power lines on birds and bats should be addressed, particularly with regard to raptors.

Vegetation Comment Summary

Letter #	Author	Comment
KSL-0006	Defenders of Wildlife, The Wilderness Society, Wyoming Outdoor Council, Wyoming Wilderness Association, Upper Green River Valley Coalition, American Lands Alliance	Prohibit any mechanical treatments (e.g., thinning) of vegetation in wilderness areas or wilderness study areas.
		BLM should determine what the desired outcome(s) from oil and gas leasing, exploration, and development activities are, particularly with reference to the desired outcome(s) for the prevention of unnecessary or undue degradation of public lands.
		The RMP should make provision for implementing BLM's Riparian-Wetland Initiative, and seek to implement the specific objectives established in that initiative, particularly the objective of restoring 75% of riparian areas to "proper functioning condition (PFC)."
		Prohibit any mechanical treatments (e.g., thinning) of vegetation in wilderness areas or wilderness study areas.
		Provide that funds for fire management should be used, in accordance with our recommendations on invasive and exotic species, to eradicate flammable invasive species such as cheatgrass and restore native species.
		Provide that riparian areas should be restored so that they can serve as natural firebreaks.
		Provide that fire suppression efforts and related vegetation management efforts (like thinning) are focused on the "wildland urban interface."
		Insure livestock grazing does not adversely impact fragile resources such as riparian areas.
		Measures and stipulations to minimize or avoid the spread of weed[s] <i>must</i> be provided.

Vegetation Comment Summary (continued)

Letter #	Author	Comment
KSL-0009	WGFD	Management of riparian areas in this arid climate will always be an issue. The RMP should especially address PFC. The RMP should explore the possibility of setting riparian objectives and desired future condition beyond what is currently presented in PFC evaluations.
KSL-0012	Biodiversity Conservation Alliance	The new RMP should provide measures that protect the habitat of indigenous populations of Bonneville and Colorado River cutthroat trout. Protective measures should ensure that sediment loading does not occur in streams inhabited by these two subspecies, that surface-disturbing activities do not take place on floodplains, that riparian vegetation achieves PFC and is not overgrazed, and that toxic coalbed methane wastewater and other pollutants are not discharged into waterways containing these populations.
KSL-0021	Edward M. Bown	The RMP should recognize the need to maintain the ecological role of fire in promoting stand renewal in the sagebrush steppe and aspen/mountain brush vegetation types. Prescribed fire and other vegetation treatments should be available to assure that the natural plan succession processes are maintained to provide biological diversity and productivity on range landscapes.
		The RMP should recognize the need to maintain an aggressive control and prevention program against noxious and invasive plants.
		The RMP should provide mineral production on public land while assuring appropriate rehabilitation/re-vegetation on all disturbed sites (wells, access roads, pipelines).
		It should also address prevention and treatment of noxious and invasive weeds on all disturbed sites as well.
KSL-0023	Arnold Larson	Weed management needs to continue.
KSL-0028	Sweetwater County Conservation District	The ecological role of fire should be maintained to promote stand renewal in the sagebrush steppe and aspen/mountain brush vegetation types. Prescribed fire and other vegetation treatments should be available to assure that the natural plan succession processes are maintained to provide biological diversity and productivity on range landscapes.
		An aggressive control and prevention program against noxious and invasive plants should be maintained.
		Mineral production should be provided on public land. Appropriate rehabilitation/re-vegetation on disturbed site should address prevention and treatment of noxious and invasive weeds on these sites.

Vegetation Comment Summary (continued)

Letter #	Author	Comment
KSL-0029	W & M Thoman Ranches, LLC	The RMP should recognize the need to maintain the ecological role of fire in promoting stand renewal in the sagebrush steppe and aspen/mountain brush vegetation types. Prescribed fire and other vegetation treatments should be available to assure that the natural plant succession processes are maintained to provide biological diversity and productivity on range landscapes.
		The RMP should recognize the need to maintain an aggressive control and prevention program against noxious and invasive plants.
		There are forest health and fire issues in the Kemmerer RMP area and they should be dealt with on a proactive basis.
		The RMP should provide mineral production on public land while assuring appropriate rehabilitation/re-vegetation on all disturbed sites (wells, access roads, pipelines). It should address prevention and treatment of noxious and invasive weeds on these disturbed sites as well.
KSL-0034	National Wildlife Federation, Greater Yellowstone Coalition, Defenders of Wildlife, The Wilderness Society, Wyoming Outdoor Council	BLM should determine what the desired outcome(s) from oil and gas leasing, exploration, and development activities are, particularly with reference to the desired outcome(s) for endangered species protection, prevention of habitat fragmentation, protecting the naturalness of landscapes and their aesthetic appeal, the prevention of unnecessary or undue degradation of public lands, the prevention of air and water pollution, and the protection of surface owner rights on split-estate lands.
		The RMP should make provision for implementing BLM's Riparian-Wetland Initiative, and seek to implement the specific objectives established in that initiative, particularly the objective of restoring 75% of riparian areas to "PFC."
		All riparian and wetland areas should be subject to NSO stipulations.
		The condition of springs and riparian areas, including biotic and abiotic components, and whether they are in PFC must be given special attention.

Vegetation Comment Summary (continued)

Letter #	Author	Comment
KSL-0034 (continued)	National Wildlife Federation, Greater Yellowstone Coalition, Defenders of Wildlife, The Wilderness Society, Wyoming Outdoor Council	The impacts of grazing on riparian areas should receive particular attention in the EIS, and the RMP should make binding and mandatory provisions to deal with the impacts of grazing in riparian areas.
		Riparian areas and wetlands are of critical importance to the biological functioning of the RMP area, and are exceeding rare. OHVs, except on designated trails, are not appropriate in these fragile ecosystems.
		BLM ensure the RMP provides for compliance with Executive Order 13112, which established requirements and procedures Federal agencies are to adhere to relative to invasive species.
		The EIS should fully analyze the extent of the invasive species problem in this area, the causes, and options for both restoration and prevention in the future.
		The BLM should conduct surveys to determine the location and characteristics of native plant communities and rare or special status species.
		The RMP must target areas with threatened, endangered, or sensitive plants for noxious weed control activities as a first priority.
		The RMP must exclude areas with threatened, endangered, or sensitive plants from fuelwood cutting areas.
		BLM must survey the planning area to document all “relict” or undisturbed plant communities.
		Protection of riparian plan communities should receive special attention in the RMP.
		Chaining, roller-chopping, or similar methods of vegetation manipulation must be prohibited.
		Livestock must be excluded from a restoration/revegetation site.
		Chemical treatments of noxious weed species should be used only if damage to other resources in the area is significant.
		Prioritize areas of which fire could improve the vegetation communities and then allow natural fires to burn in these areas.
		Establish monitoring plots to determine the effectiveness of the treatments used for invasive plant control and to provide baseline data of overall change in conditions.
		Fuelwood harvesting must be carefully regulated, and should be concentrated in areas that have already been disturbed.
		Provide that fire suppression efforts and related vegetation management efforts (like thinning) are focused on the “wildland urban interface.”
Prohibit any mechanical treatments (e.g., thinning) of vegetation in wilderness areas or wilderness study areas.		
Prohibit road building as a means to accomplish any vegetation treatments in furtherance of the fire policy.		

Vegetation Comment Summary (continued)

Letter #	Author	Comment
KSL-0034 (continued)	National Wildlife Federation, Greater Yellowstone Coalition, Defenders of Wildlife, The Wilderness Society, Wyoming Outdoor Council	All riparian areas should be designated ACECs and given special management.
		BLM limit any further fragmentation of sagebrush communities.
		Establish a program or at least guidance for how BLM will attempt to work with other landowners relative to biodiversity protection efforts.
		It is critical that the Clean Water Action Plan and Riparian-Wetlands Initiative be fully implemented by the RMP, and that riparian areas be afforded ACEC protection.
		Completion of “a broad inventory” of all riparian areas and an evaluation of their functioning condition.
		Specific steps that will be undertaken so that riparian areas that are not in PFC can be restored.
		Exclusion of OHVs from riparian areas and wetlands except on designated routes.
		Incorporation of riparian and wetland area protection with protection of the associated watersheds.
		Assurance that livestock grazing standards and guidelines and Fundamentals of Rangeland Health are complied with, and that livestock grazing is excluded from riparian areas as needed.
		Development of an effective monitoring program that measures biodiversity and wildlife populations, soil erosion, vegetation health, the presence of non-native species, water quality and quantity, and the impacts of other uses such as grazing, OHVs, recreation uses, and other activities.
		A prohibition on oil and gas leasing and development in riparian areas, or a requirement for NSO stipulations.
		A prohibition on the issuance of rights-of-way in riparian and wetlands areas, or in areas where such use would adversely impact riparian areas.
		Identification of lands for acquisition in riparian or wetlands areas that are ecologically, hydrologically or geologically linked to BLM wetlands and crucial to their functioning.
Designation of riparian areas and wetlands as ACECs.		
KSL-0041	Unknown	The RMP needs to address noxious plant invasion.
KSL-0045	William R. Taliaferro	Some excessive wildlife populations are affecting resources along the few wetlands in the area.
KSL-0047	Nathan G. Maxon	Grazing reductions should be implemented in critical winter range.
KSL-0048	Wayne Burkhardt	The RMP should provide mineral production on public land while assuring appropriate rehabilitation/re-vegetation on all disturbed sites (wells access roads, pipelines, etc.). It should address prevention and treatment of noxious and invasive weeds on these disturbed sites as well.

Vegetation Comment Summary (continued)

Letter #	Author	Comment
KSL-0048 (continued)	Wayne Burkhardt	The RMP should recognize the need to maintain the ecological role of fire in promoting stand renewal in the sagebrush steppe and aspen/mountain brush vegetation types. Prescribed fire and other vegetation treatments should be available to assure that the natural plant succession processes are maintained to provide biological diversity and productivity on range landscapes. The RMP should recognize the need to maintain an aggressive control and prevention program against noxious and invasive plants.
		Special efforts should be made to inform and educate OHV users about identifying noxious and invasive weeds preventing weed spread effects of invasives on wildlife habitat and consequences of weed infestations.
KSL-0050	Facilitated Notes	Weeds – invasive species.
		Wildfires bring cheatgrass.
		Stipulations on public lands – users to control noxious weeds.
		Noxious weed transport on vehicles, streams, irrigation ditches.
		Add Halogeton on noxious weed list.
		Rights-of-ways – weed issue.
KSL-0054	Edward M. Bown, Diamond W Ranch Co., Inc., Rees Land & Livestock Co., JW Ranching Co., Inc., K-Ron Ranch, LLC	The RMP should recognize the need to maintain the ecological role of fire in promoting stand renewal in the sagebrush steppe and aspen/mountain brush vegetation types. Prescribed fire and other vegetation treatments should be available to assure that the natural plant succession processes are maintained to provide biological diversity and productivity on range landscapes.
		The RMP should recognize the need to maintain an aggressive control and prevention program against noxious and invasive plants.
		The RMP should provide mineral production on public land while assuring appropriate rehabilitation/re-vegetation on all disturbed sites (wells, access roads, pipelines).
		It should also address prevention and treatment of noxious and invasive weeds on all disturbed sites as well.
		Coordinate T.E.s with USFS in joint areas.

Visual Resources Comment Summary

Letter #	Author	Comment
KSL-0004	Wyoming Department of State Parks and Cultural Resources, SHPO	Special attention should be given to viewshed protection of historically significant transportation corridors (e.g., trails, roads, railroads).
KSL-0005	Anadarko Petroleum Corp.	BLM should make it clear that VRM decisions are on an equal footing with other resource considerations.
		Management decisions for the various VRM inventory classification must give consideration to other factors such as recreational user days, mineral development potential, management and presence of other existing resource uses.
KSL-0006	Defenders of Wildlife, The Wilderness Society, Wyoming Outdoor Council, Wyoming Wilderness Association, Upper Green River Valley Coalition, American Lands Alliance	BLM should determine what the desired outcome(s) from oil and gas leasing, exploration, and development activities are, particularly with reference to the desired outcome(s) for protecting the naturalness of landscapes and their aesthetic appeal and the prevention of unnecessary or undue degradation of public lands.
		Protect the quality of scientific, scenic, historical, ecological, environmental, air and atmospheric, and water resource, as well as archeological values.
KSL-0010	National Trust for Historic Preservation	Provide adequate buffer zones to ensure that surface activities will not adversely impact the viewshed for National Historic Trails.
		Restrict activities by applying NSO restrictions or other enforceable stipulations adequate to prevent all impacts to the historic viewsheds of National Historic Trail.
KSL-0022	Fern and Fred Linton	Oil and gas development – need a clear definition of viewshed in regards to Historic Trail.
KSL-0024	ChevronTexaco	Encourage the BLM to retain the current Controlled Surface Use Stipulation of ¼ mile or line of sight (whichever is less) on either side of National Historic Trails. Such Stipulations should be applied only to those trails that exist “on the ground,” and not to generalized areas in which trails are thought to have been located but for which there is not evidence.

Visual Resources Comment Summary (continued)

Letter #	Author	Comment
KSL-0026	Dan C. Kominsky	To see the lower Ham’s Fork and the Green River Basins turn into a checkerboard of tanks and roads is visually and aesthetically “criminal.” To extend this scarring into the foothills and mountains is inexcusable.
		The so-called blessing of an abundance of natural resources like coal and natural gas is fast becoming a curse on the natural beauty of southwest Wyoming.
KSL-0031	Matthew W. Krall	In addition scenic corridors should be maintained along Hwy. 189 to Pindale and the natural green river basin corridor.
		To lessen the effects of habitat fragmentation, visual resources, loss of public domain, and their interrelationships to each other and other management issues, use the nine-point directional drilling techniques, consolidation of apparatuses and hardware, underground cauldrons to lessen visual deterioration, consolidation of road networks, and immediate reclamation of areas of surface disturbances.
KSL-0032	EOG Resources	[MSA] Evaluating the historic setting and landscape for National Historic Trails does not necessarily require a decision that insists upon preservation of visual characteristics identical to those that existed during the times when the trails were actually in use.
		[MSA] Inspection of Figure 2 in the MSA summary shows that all of the National Historic Trails cross or parallel major roads or highways and many travel through or adjacent to towns and cities. To insist that oil and gas development remain hidden from viewpoints along these trails is blatantly discriminatory against the industry.
KSL-0034	National Wildlife Federation, Greater Yellowstone Coalition, Defenders of Wildlife, The Wilderness Society, Wyoming Outdoor Council	BLM should determine what the desired outcome(s) from oil and gas leasing, exploration, and development activities are, particularly with reference to the desired outcome(s) for endangered species protection, prevention of habitat fragmentation, protecting the naturalness of landscapes and their aesthetic appeal, the prevention of unnecessary or undue degradation of public lands, the prevention of air and water pollution, and the protection of surface owner rights on split-estate lands.
		The RMP should adopt a prohibition against leasing in any Scenic or Recreational river corridors, or potential corridors, not just Wild river corridors, and failing that NSO stipulations should be required. ACECs should not be subject to leasing, or, at a minimum, should be subject to NSO stipulations.
		The BLM must prepare and maintain on a continuing basis an inventory of visual values for each RMP effort.
		Visual qualities of all lands within the RMP area must be inventoried, and VRM classifications for such lands must be analyzed in the EIS.

Visual Resources Comment Summary (continued)

Letter #	Author	Comment
KSL-0034 (continued)	National Wildlife Federation, Greater Yellowstone Coalition, Defenders of Wildlife, The Wilderness Society, Wyoming Outdoor Council	Areas not currently being developed for oil and gas production should be classified as at least VRM II, in order to “retain the existing character of the landscape.”
KSL-0037	Philip Krall	Concerned about what is happening to our wildlife and beautiful landscapes.
KSL-0050	Facilitated Notes	Concerned about visual aspects of wind farms particularly in relation to historic trails.
KSL-0052	Facilitated Notes	Do viewshed analysis on historic trails to ensure protection of trails and their use.

Water Resources Comment Summary

Letter #	Author	Comment
KSL-0005	Anadarko Petroleum Corp.	Ensure that all possible methods for handling coalbed methane produced water are addressed.
KSL-0006	Defenders of Wildlife, The Wilderness Society, Wyoming Outdoor Council, Wyoming Wilderness Association, Upper Green River Valley Coalition, American Lands Alliance	Protect the quality of scientific, scenic, historical, ecological, environmental, air and atmospheric, and water resource, as well as archeological values.
		The RMP must ensure all components of State water quality standards are met, not just numeric standards.
		Ensure compliance with the State’s anti-degradation policy and protect Outstanding National Resource waters. While States designate Outstanding National Resource waters, the Clean Water Action Plan makes it appropriate for BLM to identify waters that should be fully protected by this designation during its planning process, and to make recommendations to the state and USEPA accordingly.
		The RMP should include affirmative steps toward reducing the impaired status, regardless of whether the State has made a specific allocation of pollutant load to BLM lands at the time the RMP is prepared. If any specific load allocation has been made by the State for activities on BLM lands, BLM should obviously ensure that these are complied with.
		An important step toward complying with the Clean Water Act (CWA) can be made by ensuring the RMP adheres to and incorporates elements of the Clean Water Action Plan.
		The number of wells that have been approved and the number of wells that have been drilled throughout the Resource Area.

Water Resources Comment Summary (continued)

Letter #	Author	Comment
KSL-0006 (continued)	Defenders of Wildlife, The Wilderness Society, Wyoming Outdoor Council, Wyoming Wilderness Association, Upper Green River Valley Coalition, American Lands Alliance	Any RFD scenario development must also be based on baseline data and ongoing monitoring. Accordingly, in this section of the RMP EIS the BLM must set forth the following: 1) Baseline air and water quality data; Data from past, current, and ongoing monitoring of air and water quality.
		The use of hydraulic fracturing and the impacts of drilling fluids and chemicals must be considered in the EIS. Hydraulic fracturing and drilling fluids contain a wide array of chemicals, many of which are clearly toxic or hazardous. The appropriateness of using these chemicals must be addressed in the EIS.
		The RMP EIS must identify potentially adverse impacts on water chemistry in highly sensitive high altitude lakes.
		With respect to grazing insure adherence to the Clean Water and Safe Drinking Water Act.
KSL-0007	State of Wyoming, DEQ	Address discharge and handling of produced water from the oil and gas industry.
KSL-0009	WGFD	Plans and Reports that are applicable: Conservation Agreement and Strategy for Colorado River cutthroat trout in the States of Colorado, Utah and Wyoming; Conservation and Management Plan for Three Fish Species – Roundtail chub, Bluehead sucker, Flannelmouth sucker; Management Consideration for native nongame fishes of Wyoming – Native Nongame Fishes Conservation Assessment, Feb 2003, WGFD Administrative Report.
		The RMP should address the foreseeable level of coalbed methane development and the probable impacts on fisheries and aquatic habitats. This should include habitat fragmentation, associated roadway impacts (such as erosion resulting in sedimentation to both ephemeral and perennial waterways) and other cumulative impacts associated with mineral, oil or gas extraction. The RMP should also address mitigation approaches to minimize these impacts.
		Road management should be addressed in the RMP, particularly in reference to identifying best management practices that reduce erosion and surface runoff resulting from road construction.
		The RMP should address the issue of roads in the floodplain. Where streams must be crossed, best management practices should be employed to maintain stream equilibrium upstream and downstream of a crossing.

Water Resources Comment Summary (continued)

Letter #	Author	Comment
KSL-0012	Biodiversity Conservation Alliance	The new RMP should forbid industrial development on floodplains.
		The Kemmerer RMP revision should prohibit surface disposal of coalbed methane wastewater.
		The new RMP should provide measures that protect the habitat of indigenous populations of Bonneville and Colorado River cutthroat trout. Protective measures should ensure that sediment loading does not occur in streams inhabited by these two subspecies, that surface-disturbing activities do not take place on floodplains, that riparian vegetation achieves PFC and is not overgrazed, and that toxic coalbed methane wastewater and other pollutants are not discharged into waterways containing these populations.
KSL-0016	Norris Tratnik	More water sources need to be made available for sage grouse and wildlife. All livestock water troughs should have installed bird ramps.
		All water systems used by livestock should be left on – not emptied – when livestock have been moved. Some spring drinking water sources in meadow vegetation should be fenced, and water should be piped to an outside stock watering trough.
KSL-0022	Fern and Fred Linton	(illegible) creek wetlands needs designated wildlife viewing areas so that ATV and vehicles do not randomly cross meadows etc. to access various sites.
KSL-0023	Arnold Larson	Water development to better utilize existing forage.
KSL-0032	EOG Resources	[MSA] Although produced water disposal may be of concern to the BLM, it is incumbent upon the BLM to address its concern with the appropriate management agency, the State.
KSL-0034	National Wildlife Federation, Greater Yellowstone Coalition, Defenders of Wildlife, The Wilderness Society, Wyoming Outdoor Council	The RMP must ensure all components of State water quality standards are met, not just numeric standards.
		If the State water quality standards applicable to the RMP area have been made narrative provisions a component of water quality standards, the RMP should ensure these narrative standards are fully met, and modify management where they are not.
		While States designate Outstanding National Resource waters, the Clean Water Action Plan makes it appropriate for BLM to identify waters that should be fully protected by this designation during its planning process, and to make recommendations to the State and USEPA accordingly.
		The RMP should include affirmative steps toward reducing the impaired status, regardless of whether the State has made a specific allocation of pollutant load to BLM lands at the time the RMP is prepared. If any specific load allocation has been made by the State for activities on BLM lands, BLM should obviously ensure that these are complied with.
		The RMP should ensure full compliance with sections 401 and 404 of the CWA.

Water Resources Comment Summary (continued)

Letter #	Author	Comment
KSL-0034 (continued)	National Wildlife Federation, Greater Yellowstone Coalition, Defenders of Wildlife, The Wilderness Society, Wyoming Outdoor Council	Ensure the RMP adheres to and incorporates elements of the Clean Water Action Plan.
		The BLM is specifically required to provide for “enhanced watershed restoration efforts, including the integration of watershed restoration as a key part of land management planning and program strategies,” among many other requirements.
		The RMP should prohibit discharge of water extracted from coalbeds onto the ground or into surface waters.
		The EIS should consider the problem of produced water storage pits/reservoirs leading to concentrated chemical solutions that harm wildlife (or other resources), and should particularly consider compliance with the Migratory Bird Treaty Act in this regard.
		If water from coalbed methane production is discharged, directly or indirectly, into streams, the impacts of augmented flows and increased concentrations of salts (ions) and dissolved solids on the ecological characteristics of the streams (perennial or intermittent) should be analyzed.
		If produced waters are or become a “discernible, confined and discrete conveyance . . . from which pollutants are or may be discharged,” they must be treated as point source discharges of pollutants and a NPDES permit must be required. Based on these analyses, the RMP should provide standards to prevent or mitigate these impacts.
		If produced waters are not reinjected, potential effects on agriculture must be considered. Seepage of methane and its effects on vegetation, water (including domestic water and aquifers), and even the safety of people’s homes must be considered.
		The appropriateness of using these chemicals must be addressed in the EIS, and in particular the EIS and the final RMP should ensure compliance with the CWA, Safe Drinking Water Act, Toxic Substances Control Act, Resource Conservation and Recovery Act, and the Comprehensive Environmental Response Compensation Liability Act (CERCLA-the Superfund) relative to the use of these and other toxic and hazardous substances.
		BLM should ensure that oil and gas drilling operations (including well pads) comply with any applicable stormwater discharge requirements, including acquiring NPDES permits, as required.
		The condition of springs and riparian areas, including biotic and abiotic components, and whether they are in PFC must be given special attention.
BLM should ensure there is sufficient water quality monitoring relative to the impacts of livestock grazing.		
The BLM should consider that rivers and streams in the RMP area are of tremendous importance to the wildlife and fish, and the beauty and recreational appeal of the area.		

Water Resources Comment Summary (continued)

Letter #	Author	Comment
KSL-0034 (continued)	National Wildlife Federation, Greater Yellowstone Coalition, Defenders of Wildlife, The Wilderness Society, Wyoming Outdoor Council	Incorporation of riparian and wetland area protection with protection of the associated watersheds.
		Development of an effective monitoring program that measures biodiversity and wildlife populations, soil erosion, vegetation health, the presence of non-native species, water quality and quantity, and the impacts of other uses such as grazing, OHVs, recreation uses, and other activities.
		Coalbed methane development can lower water tables, which have widespread implications and therefore must be addressed in the EIS. If produced waters are not re-injected, potential effects on agriculture must be considered. Dewatering coalbeds can increase the likelihood of difficult-to-control fires. Seepage of methane and its effects on vegetation, water (including domestic water and aquifers), and even the safety of people's homes must be considered.
KSL-0045	William R. Taliaferro	Limited and thank God this resource belongs to the State and occurs mostly on private lands.
KSL-0047	Nathan G. Maxon	All known springs should be fenced.

RMP Revision Process Comment Summary

Letter #	Author	Comment
KSL-0005	Anadarko Petroleum Corp.	Resource monitoring must occur simultaneously with RMP to ensure that sufficient information is available to determine impacts.
		Allow development to occur during revisions of RMP.
KSL-0006	Defenders of Wildlife, The Wilderness Society, Wyoming Outdoor Council, Wyoming Wilderness Association, Upper Green River Valley Coalition, American Lands Alliance	Consider the <i>relative</i> value of the resources involved. By this legally required measure, rare, unique, and sensitive native species have a relative value far in excess of more common or easily replaced public land resources, or resources that can be provided from other lands. The same is true of many other resources, such as cultural and wilderness resources. Accordingly, the alternative plans that are developed, and particularly the preferred alternative, must give special emphasis to protecting and providing for relatively rare resources.
		The RMP must insure that the policies and goals set forth in NEPA are met.
		EIS must include precise plans to monitor resources of the life of this RMP as well as plans to ensure that the monitoring is completed in a timely and thorough fashion.
		Insure adherence with international principles and law and utilize current ecological data.

RMP Revision Process Comment Summary (continued)

Letter #	Author	Comment
KSL-0006 (continued)	Defenders of Wildlife, The Wilderness Society, Wyoming Outdoor Council, Wyoming Wilderness Association, Upper Green River Valley Coalition, American Lands Alliance	In revising this RMP, BLM should consider, analyze, and wherever appropriate facilitate, international efforts to prevent environmental decline. These include a number of international agreements and treaties for resource protection, such as United Nations biosphere reserves, migratory bird treaties, the Convention on International Trade in Endangered Species, and international efforts related to biological diversity preservation, among others.
		In managing the public land the BLM shall take any action necessary to prevent the unnecessary or undue degradation of the lands as required by FLPMA.
		The requirement to manage for multiple use and sustained yield has substantive components that must be adhered to.
		Ensure full compliance with Sections 401 and 404.
		Ensure compliance with the ESA.
		Additionally, there are two other areas of crucial importance relative to the Section 7 “duty to ensure” that BLM must abide by to protect threatened or endangered species. First is the need to engage in careful BAs or other ESA-related analyses to determine if listed species in the RMP area are likely to be adversely affected by the RMP, or by actions carried out under the RMP.
		Additionally, BLM sometimes has totally merged BAs with accompanying EISs, making ESA compliance totally indistinguishable from NEPA compliance. This is inappropriate because the substantive requirements of the ESA (imposing mandatory duty to conserve listed species) cannot be met by totally merging them with the procedural requirements of NEPA (requiring analysis and disclosure of environmental impacts). The RMP should prohibit this approach and certainly it should not be utilized it in the RMP EIS itself.
		Consultation regarding the RMP is required and should be initiated or reinitiated relative to all listed, proposed, and petitioned species and their critical habitat in the RMP area so as to ensure that the activities authorized or contemplated in the RMP do not jeopardize listed species or result in the destruction or adverse modification of critical habitat.
		Consultation should be completed and any biological opinion(s) issued by the Services adopted by BLM and made a binding part of the RMP (and activities occurring under it) prior to approval of the RMP.

RMP Revision Process Comment Summary (continued)

Letter #	Author	Comment
KSL-0006 (continued)	Defenders of Wildlife, The Wilderness Society, Wyoming Outdoor Council, Wyoming Wilderness Association, Upper Green River Valley Coalition, American Lands Alliance	The RMP should establish criteria to ensure that the regulatory requirements for reinitiating consultation are complied with at the earliest possible time so as to ensure species are not jeopardized. (See 50 CFR § 402.16 (establishing reinitiation criteria). Moreover, the prohibition on foreclosing reasonable and prudent alternatives, as provided for in section 7(d) of the ESA, must be enforced by the RMP.
		In the context of oil and gas leasing, “incremental step” consultation is of particular concern, and the EIS must address this issue. The decision in <i>Conner v. Burford</i> , 848 F.2d 1441 (9 th Cir. 1988) should control all consultation in the context of oil and gas development.
		BLM must assist the USFWS in developing a fully informed understanding of the effects of the <i>entire</i> action, even if incremental step consultation is used.
		Consistent with existing laws, the BLM shall implement management plans that conserve candidate species and their habitats and shall ensure that actions authorized, funded, or carried out by the BLM do not contribute to the need for the species to become listed.
		For candidate species [and sensitive species] where lands administered by the BLM or BLM authorized actions have a significant effect on their status, [the BLM shall] manage the habitat to conserve the species by: a. Ensuring candidate [and BLM sensitive species] are appropriately considered in land use plans (BLM 1610 Planning Manual and Handbook, Appendix C). b. Developing, cooperating with, and implementing range-wide or site-specific management plans, conservation strategies and assessments for candidate [and sensitive] species that include specific habitat and population management objectives designed for conservation, as well as management strategies necessary to meet those objectives. c. Ensuring that BLM activities affecting the habitat of candidate [and sensitive] species are carried out in a manner that is consistent with the objectives for managing those species. d. Monitoring populations and habitats of candidate [and sensitive] species to determine whether management objectives are being met.
		Allow for public participation in the development of oil and gas resources.
		The RMP should address ADP notification and provide that all those who request mailed notice receive such notice.

RMP Revision Process Comment Summary (continued)

Letter #	Author	Comment
KSL-0006 (continued)	Defenders of Wildlife, The Wilderness Society, Wyoming Outdoor Council, Wyoming Wilderness Association, Upper Green River Valley Coalition, American Lands Alliance	The BLM must adopt a RFD scenario that balances energy development with the protection of other valuable natural resources. If the BLM fails to do so, the Valley could be turned into a single continuous gas field in violation of FLPMA's multiple-use mandate and a number of other federal environmental laws.
		Prevent unnecessary or undue degradation and discretion to impose reasonable mitigation measures, development in the Upper Green River Valley must occur in orderly stages.
		The BLM must ensure that it while developing oil and gas resource it prevents the unnecessary and undue degradation of the lands and avoids of impacts of oil and gas development where technologically feasible, and especially in cases where avoiding impacts is practical.
		The RMP should define precisely when the use of Sundry Notices is appropriate, and in our view they are inappropriate for anything other than the enumerated activities mentioned at 43 CFR § 3162.3-2(a). Additionally, the RMP should define when NEPA compliance is required and what opportunities exist for public involvement relative to Sundry Notices.
		BLM may not rely on state permitting process to fulfill obligations under FLPMA and NEPA.
KSL-0010	National Trust for Historic Preservation	Engage in consultation with Native Americans early in planning process to address concerns and identify culturally significant areas.
		Follow mandates in BLM's CRMP manual.
KSL-0011	State of Wyoming, Office of the Governor	The BLM be sensitive to maintaining access to State trust lands isolated by lands under BLM's jurisdiction, address the economic values of the mineral estate potential for the area, only revise those parts of the existing RMP which are "not working," and maximize a balanced approach to the use of the area's resources, minimizing regulation as much as possible. Continuous monitoring of impacts and mitigation effectiveness, and flexibility to manage adaptively, will be key issues.
KSL-0012	Biodiversity Conservation Alliance	The BLM should consult with the tribes indigenous to the Kemmerer Field Office.
KSL-0013	Wyoming Department of Agriculture	Coordinate with ranchers.
		Work cooperatively with public and interested stakeholders.

RMP Revision Process Comment Summary (continued)

Letter #	Author	Comment
KSL-0024	ChevronTexaco	Individuals who are on the work groups to have a scientific and working knowledge of the issues being addressed, as well as an understanding of the industry(s) that will be affected by the issues and decisions.
		Project proponents should be represented on the work group.
		A balanced approach to managing all of the resources being affected, as well as an open dialogue with the public, needs to be integral part of the process.
KSL-0028	Sweetwater County Conservation District	There should be cooperation and coordination with other land management agencies, such as the USFS, regarding forestry health, forest restoration, and fires.
KSL-0032	EOG Resources	[MSA] Concerned that inaccuracies or incomplete explanations included in the MSA summary could result in an inaccurate or incomplete description of baseline conditions.
		[MSA] Operators should be allowed to cooperatively develop the RFD scenario with the BLM and should be able to review the RFD scenario after it is developed in order to ensure document accuracy.
		[MSA] EOG urges that the BLM allow sufficient time be allowed to conduct a thorough review of the data supplied to the BLM by management area operators for incorporation into the document analysis.
		[MSA] The RFD scenario and EIS must provide documentation of the assumptions that it uses to estimate surface disturbance.
		[MSA] The information presented in the RFD scenario and EIS should be easily understandable and not open to misinterpretation.
		It is absolutely essential that the RFD scenario be used to develop alternatives for the EIS that implements the new RMP. The EIS should describe a rationale for the development of each alternative considered.
		The BLM's use of environmental management strategies that may be reconsidered and changed over the RMP planning period presents a moving target of goals and objectives that operators cannot meet while planning their drilling and production programs.
		The endorsement and use of adaptive environmental management provides an opportunity to focus groups to lobby the BLM to include their politically motivated agendas into RMP guidance.
		The introduction of new information or data that fundamentally changes the environmental management strategies decided upon in the RMP may effectively supplant strategies based upon data acquired over a long period of time.

RMP Revision Process Comment Summary (continued)

Letter #	Author	Comment
KSL-0032 (continued)	EOG Resources	If, over the time frame of the RMP, professionally accepted, but unanticipated, data becomes available that fundamentally alters the basic premises upon which oil and gas operators plan their future operations, the change in management direction should be implemented only after a review of the impacts that such a change may cause.
		Consider the analysis of impacts resulting from typical field development using environmental assessments rather than environmental impact statements.
		A Statement of Adverse Energy Impacts should be developed for each alternative and should discuss the following topics: the impact of timing restrictions; the impact of designated areas excluded from energy development; costs to oil and gas development associated with the mandate of alternative drilling technologies, such as directional drilling; and costs to consumers if energy development is hindered or delayed as supplies fall short of demand.
KSL-0034	National Wildlife Federation, Greater Yellowstone Coalition, Defenders of Wildlife, The Wilderness Society, Wyoming Outdoor Council	In determining the scope of the EIS, BLM must consider “connected actions,” “cumulative actions,” and “similar actions.” Examples of connected actions of oil and gas development actions/projects that would not occur but for authorization in the RMP include leasing, exploration projects, and full-field development projects.
		BLM considers oil and gas leasing, exploration, and development activities under NEPA.
		BLM should determine what the desired outcome(s) from oil and gas leasing, exploration, and development activities are, particularly with reference to the desired outcome(s) for endangered species protection, prevention of habitat fragmentation, protecting the naturalness of landscapes and their aesthetic appeal, the prevention of unnecessary or undue degradation of public lands, the prevention of air and water pollution, and the protection of surface owner rights on split-estate lands.
		BLM should take steps to gather needed information in all but the narrow range of exceptions permitted by the Council on Environmental Quality (CEQ) regulations.
		Monitoring of RMP implementation and the impacts resulting from plan implementation are crucial.
		BLM require, in a direct and positive fashion, that oil and gas development not cause unnecessary or undue degradation, and to ensure that this is the case.
		BLM must ensure compliance with the land use planning requirements of FLPMA.
		The requirement to manage for multiple use and sustained yield has substantive components that must be adhered to.

RMP Revision Process Comment Summary (continued)

Letter #	Author	Comment
KSL-0034 (continued)	National Wildlife Federation, Greater Yellowstone Coalition, Defenders of Wildlife, The Wilderness Society, Wyoming Outdoor Council	Wherever an ACEC is designated, BLM should consider withdrawing the areas from operation of the mining and mineral leasing laws pursuant to 43 USC § 1714 so as to ensure there is no irreparable damage.
		Where a potential ACEC has only been identified, BLM must nevertheless “take all feasible action to assure that those qualities that make the resource important are not damaged or otherwise subjected to adverse change pending an ACEC designation decision.”
		The RMP should ensure full compliance with sections 401 and 404 of the CWA.
		Ensure the RMP adheres to and incorporates elements of the Clean Water Action Plan.
		The EIS must address the full range of resource issues and the resource management plan must adopt needed protections for those resources.
		The RMP should adopt specific definitions of what constitutes “due care and diligence,” “undue damage to surface or subsurface resources” and what specifically must be achieved to “reclaim the disturbed surface. . . .” At a minimum, the requirements of Onshore Oil and Gas Order No. 1, especially relative to reclamation plans, must be strictly complied with, and the EIS should analyze whether wells reclaimed in the past pursuant to these requirements have actually been effectively reclaimed.
		The lease acreages limits specified at 43 CFR § 3101.2-1(a) should be monitored and enforced by BLM, and the RMP should make provision for such.
		BLM should fully utilize well spacing densities that are appropriate for protecting other resource values in an area, as required pursuant to 43 USC § 1732(b) and other law.
		The EIS should consider the problem of produced water storage pits/reservoirs leading to concentrated chemical solutions that harm wildlife (or other resources), and should particularly consider compliance with the Migratory Bird Treaty Act in this regard.
		BLM sometimes seems to take the position that it must approve an application for permit to drill (APD) within 30 days. This is incorrect, and the RMP should specify the circumstances under which BLM may take more than 30 days to review an APD.
The lack of availability of NOSs and APDs hampers public participation, which violates NEPA. The BLM should include provisions in the RMP that will correct these problems.		
The EIS must address the issue of granting exemptions and exceptions to lease stipulations at the APD stage. At a minimum, the RMP must identify which stipulations cannot be relaxed and the specific conditions that must be met before a request to exempt or relax any of the others will be granted.		

RMP Revision Process Comment Summary (continued)

Letter #	Author	Comment
KSL-0034 (continued)	National Wildlife Federation, Greater Yellowstone Coalition, Defenders of Wildlife, The Wilderness Society, Wyoming Outdoor Council	At a minimum, granting exceptions and exemptions to stipulations constitute Federal actions subject to NEPA; that is an EIS or environmental assessment (EA) needs to be prepared before they are granted.

Mitigation Measures Comment Summary

Letter #	Author	Comment
KSL-0002	Wyoming Department of State Parks and Cultural Resources, Division of State Parks and Historic Sites	Mitigation measures need to be included in RMP EIS.
KSL-0005	Anadarko Petroleum Corp.	Application of reasonable mitigation measures (least restrictive that is necessary) designed to limit or avoid demonstrated impacts to surface resources access. Consideration of directional drilling as a mitigation tool is inappropriate for planning level analyses.
KSL-0006	Defenders of Wildlife, The Wilderness Society, Wyoming Outdoor Council, Wyoming Wilderness Association, Upper Green River Valley Coalition, American Lands Alliance	Include a wide-array of mitigation measures. Mitigation of impacts to fish and wildlife resources is assuming ever-increasing importance in project planning, especially as the rate of potentially damaging development across our public lands increases. Prevent unnecessary or undue degradation and discretion to impose reasonable mitigation measures, development in the Upper Green River Valley must occur in orderly stages. NEPA and FLPMA require consideration of mitigation measures to prevent adverse impacts. One potential method for ensuring no net loss would be to require off-site mitigation. The RMP EIS must therefore fully explore this possibility
KSL-0009	WGFD	The RMP should address mitigation approaches to minimize impacts from coalbed methane development.

Mitigation Measures Comment Summary (continued)

Letter #	Author	Comment
KSL-0011	State of Wyoming, Office of the Governor	Continuous monitoring of impacts and mitigation effectiveness, and flexibility to manage adaptively, will be key issues.
KSL-0037	Phillip Krall	The oil and gas companies should have to do some habitat mitigation projects.
KSL-0045	William R. Taliaferro	Another nice encumbering term to baffle everyone.

Cumulative Impacts Comment Summary

Letter #	Author	Comment
KSL-0005	Anadarko Petroleum Corp.	The effect of surface resource management decisions on future subsurface development opportunities and activities.
		The existing RMP decisions regarding protection measures for National Historic Trails should remain in effect until such time that Wyoming Historic Trail Management Plan is completed, subject to public review, and amended into the new RMP.
KSL-0006	Defenders of Wildlife, The Wilderness Society, Wyoming Outdoor Council, Wyoming Wilderness Association, Upper Green River Valley Coalition, American Lands Alliance	Consider connected, cumulative, and similar actions. Examples of oil and gas development actions/projects that would not occur but for authorization in the RMP include leasing, exploration projects, and full-field development projects.
		Because much of southwest Wyoming is being developed by the oil and gas industry, and pursuant to NEPA's requirement to disclose cumulative impacts, in developing an appropriate RFD scenario the BLM must consider actions being implemented outside the Kemmerer Resource Area boundaries.
		The report "Fragmenting Our Lands, the Ecological Footprint From Oil and Gas Development" should be considered. BLM must ensure its analyses of impacts to wildlife consider indirect, connected, related, long-term, and cumulative impacts in as quantitative, and scientifically supported, a manner as possible.
KSL-0008	Office of State Lands and Investments	The cumulative affect of overlapping federal land use prescriptions and restrictions within areas controlled by plans for dominant federal lands make it very hard, if not impossible, to responsibly manage the State's surface and sub-surface resources to optimize the return to the State Trust's beneficiaries as prescribed by state law.

Cumulative Impacts Comment Summary (continued)

Letter #	Author	Comment
KSL-0009	WGFD	The Conservation Agreement and Strategy for Colorado River cutthroat trout in States of Colorado, Utah, and Wyoming, 2001 was signed by federal and state agencies, including the BLM. The Agreement states four goals, and we are listing the last three as they pertain to this scoping statement: 1) to maintain areas which support abundant Colorado River cutthroat trout and manage other areas to increase abundance, 2) to maintain the genetic diversity of the species, and 3) to increase the distribution of Colorado River cutthroat trout where ecologically, sociologically, and economically feasible. This agreement should be discussed and included in the RMP Revision.
		Plans and Reports that are applicable: Conservation Agreement and Strategy for Colorado River cutthroat trout in the States of Colorado, Utah and Wyoming; Conservation and Management Plan for Three Fish Species - Roundtail chub, Bluehead sucker, Flannelmouth sucker; Management Consideration for native nongame fishes of Wyoming - Native nongame fishes conservation assessment, Feb 2003, WGFD Administrative Report.
		Together with other long-term effects (e.g., fire suppression, livestock grazing, oil and gas development, etc.) on aquatic habitat, we recommend the RMP Revision evaluate planning contingencies to react to continued drought and other cumulative effects.
		The RMP should address the foreseeable level of coalbed methane development and the probable impacts on fisheries and aquatic habitats. This should include habitat fragmentation, associated roadway impacts (such as erosion resulting in sedimentation to both ephemeral and perennial waterways) and other cumulative impacts associated with mineral, oil or gas extraction.
		With increasing intensity of land uses (energy development, recreation, etc.) the need for a comprehensive cumulative impact analysis is essential. This should be done at appropriate local and regional scales to be most meaningful.
KSL-0012	Biodiversity Conservation Alliance	The new RMP should consider the forthcoming Heart of the West Wildland Network Design and be compatible with its recommendations.
KSL-0021	Edward M. Bown	The RMP should critically analyze the cumulative effect of special land designations on future management options for land uses such as grazing, mineral production and vegetation management (prescribed burns or other cultural practices).
KSL-0028	Sweetwater County Conservation District	Special land designations should be critically analyzed for the cumulative effects on future management options for land uses (i.e. grazing, mineral production, vegetation management such as prescribed burns or other cultural practices).

Cumulative Impacts Comment Summary (continued)

Letter #	Author	Comment
KSL-0034	National Wildlife Federation, Greater Yellowstone Coalition, Defenders of Wildlife, The Wilderness Society, Wyoming Outdoor Council	In determining the scope of the EIS, BLM must consider “connected actions,” “cumulative actions,” and “similar actions.” Examples of connected actions of oil and gas development actions/projects that would not occur but for authorization in the RMP include leasing, exploration projects, and full-field development projects.
		In revising this RMP, BLM should consider, analyze, and wherever appropriate facilitate, international efforts to prevent environmental decline. These include a number of international agreements and treaties for resource protection, such as United Nations biosphere reserves, migratory bird treaties, the Convention on International Trade in Endangered Species, and international efforts related to biological diversity preservation, among others.
		Ensure the RMP adheres to and incorporates elements of the Clean Water Action Plan.
		BLM should take a proactive approach to managing air quality by, among other things: gathering baseline air quality data; setting aggressive standards; requiring any actions on public lands to meet those standards (i.e. no flaring, no two-stroke engine use on public lands, etc.); analyzing the cumulative impact of any proposed action with other past, present, and reasonably foreseeable actions; establishing an effective monitoring program; and halting any actions that contribute to air pollution if such monitoring reveals that standards have been exceeded.
		The EIS should make similar analyses relative to these minerals. Additionally, many of the recommendations in this section are in conformance with the report “Land Use Planning and Oil and Gas Leasing on Onshore Federal Lands. We request that BLM consider and respond to this report as it develops the RMP.
		The RMP should provide guidance for when the cumulative impacts of approving a number of APDs rises to the level of producing significant impacts on the human environment, requiring preparation of an EIS and even if a prior full field EIS has been prepared, the RMP should provide guidance as to when supplementation of the prior EIS should occur.
		Take special care that these “second-order” impacts are fully considered and analyzed.
		KSL-0045
KSL-0048	Wayne Burkhardt	The RMP should critically analyze the cumulative effects of special land designations on future management options for land uses such as grazing mineral production and vegetation management (prescribed burns or other cultural practices).

Cumulative Impacts Comment Summary (continued)

Letter #	Author	Comment
KSL-0054	Edward M. Bown, Diamond W Ranch Co., Inc., Rees Land & Livestock Co., JW Ranching Co., Inc., K-Ron Ranch, LLC	The RMP should critically analyze the cumulative effect of special land designations on future management options for land uses such as grazing, mineral production and vegetation management (prescribed burns or other cultural practices).

Regulatory Compliance Comments

Letter #	Author	Comment
KSL-0003	State of Wyoming, DEQ	Review air quality regulations relative to their management regulations.
KSL-0004	Wyoming Department of State Parks and Cultural Resources, State Historic Preservation Office	Follow regulatory guidelines for cultural resources.
KSL-0006	Defenders of Wildlife, The Wilderness Society, Wyoming Outdoor Council, Wyoming Wilderness Association, Upper Green River Valley Coalition, American Lands Alliance	Until an agency issues a record of decision . . . no action concerning the proposal shall be taken which would: (1) Have an adverse environmental impact; or (2) limit the choice of reasonable alternatives. 40 CFR § 1506.1(a)(1)-(2).
		In the context of oil and gas development, we specifically recommend that BLM reject the position that because regulations provide that an oil and gas lease conveys the right to “use so much of the leased lands as is necessary to explore for, drill for . . . and dispose of all of the leased resource. . .” essentially anything an oil and gas lessee proposes to do to develop a lease is “necessary” or “due” and therefore any resulting degradation of the public lands is not “unnecessary” or “undue.” <i>See</i> 43 CFR § 3101.1-2 (but also providing for substantial retained discretion in BLM to regulate oil and gas development despite issuance of the lease). Instead, we urge BLM to require, in a direct and positive fashion, that oil and gas development not cause unnecessary or undue degradation, and to ensure that this is the case.
		The RMP should establish criteria to ensure that the regulatory requirements for reinitiating consultation are complied with at the earliest possible time so as to ensure species are not jeopardized. (<i>See</i> 50 CFR § 402.16 (establishing reinitiation criteria). Moreover, the prohibition on foreclosing reasonable and prudent alternatives, as provided for in section 7(d) of the ESA, must be enforced by the RMP.

Regulatory Compliance Comments (continued)

Letter #	Author	Comment
KSL-0006 (continued)	Defenders of Wildlife, The Wilderness Society, Wyoming Outdoor Council, Wyoming Wilderness Association, Upper Green River Valley Coalition, American Lands Alliance	In the context of oil and gas leasing, “incremental step” consultation is of particular concern, and the EIS must address this issue. The decision in <i>Conner v. Burford</i> , 848 F.2d 1441 (9 th Cir. 1988) should control all consultation in the context of oil and gas development.
		For candidate species [and sensitive species] where lands administered by the BLM or BLM authorized actions have a significant effect on their status, [the BLM shall] manage the habitat to conserve the species by: a. Ensuring candidate [and BLM sensitive species] are appropriately considered in land use plans (BLM 1610 Planning Manual and Handbook, Appendix C). b. Developing, cooperating with, and implementing range-wide or site-specific management plans, conservation strategies and assessments for candidate [and sensitive] species that include specific habitat and population management objectives designed for conservation, as well as management strategies necessary to meet those objectives. c. Ensuring that BLM activities affecting the habitat of candidate [and sensitive] species are carried out in a manner that is consistent with the objectives for managing those species. d. Monitoring populations and habitats of candidate [and sensitive] species to determine whether management objectives are being met.
		The RMP should define precisely when the use of Sundry Notices is appropriate, and in our view they are inappropriate for anything other than the enumerated activities mentioned at 43 CFR § 3162.3-2(a). Additionally, the RMP should define when NEPA compliance is required and what opportunities exist for public involvement relative to Sundry Notices.
KSL-0010	National Trust for Historic Preservation	Integrate President Bush’s “Preserve America” stewardship mandates into the RMP.
		Integrate Section 110 of the NHPA into the RMP process by identifying, evaluating, and nominating properties to the National Register.
		Adequately integrate FLPMA’s multiple use mandates into RMP process.
		BLM should comply with Section 106 of the NHPA prior to designating areas for OHV use.
		Conduct a Section 106 review before designating any areas in and around National Historic Trails as open for activities that may allow surface occupancy.
KSL-0013	Wyoming Department of Agriculture	Follow all regulations and guidelines.